



Environment

Local Government Association
of South Australia

SA Government Climate Change Strategy and Legislation Consultation

Local Government Association Response

SA Government Climate Change Strategy Consultation Local Government Association Response

Introduction

The Local Government Association (LGA) appreciates the opportunity to provide a response to the papers developed as part of consultation for the creation of a new State Government Climate Change Strategy. The LGA and councils are committed to maintaining a close working relationship with the State Government to continue developing integrated solutions that both reduce carbon emissions and prepare our state for the anticipated adverse impacts of climate change.

The LGA has consulted with the local government sector on the consultation papers, seeking written responses as well as hosting a consultation session held on 7 October 2015, where each of the state consultation papers were discussed. The session was attended by representatives from eighteen councils (both metropolitan and regional). The LGA has compiled and consolidated the views expressed by councils across the state to provide a representative view on the opportunities and challenges currently being experienced across the sector.

The LGA appreciates the effort that was placed in developing the papers for consultation and in facilitating the various regional workshops. However, it was represented that councils would have preferred the papers and sessions to be more forward thinking and some of the consultation questions to be more targeted towards feasible options moving forward.

Several questions were asked about the possibility of a next stage of consultation where the State Government could take the ideas solicited in this stage and refine them into a set of feasible options that could be further consulted on and further refined to form a strategy.

The LGA recommends this two stage approach, but notes that this may not be possible with the tight timescale placed on the consultation process. However, this should be flagged as a limiting factor in future strategy consultation design.

The Adapt paper was the most forward thinking. Along with describing the status quo and current initiatives, there was also a narrative that depicted how the State Government envisaged moving forward with adaptation activities. This framework would have been useful for the other papers.

Because of overlapping themes in the papers, the remainder of this submission is arranged according to key themes arising from LGA consultation with its members (and not paper by paper). Notes on discussions (per paper) will be provided separately to this submission.

Current Status

The LGA has led or played a substantial role in the majority of climate mitigation and adaptation activities that have been undertaken across the state.

The first climate change sector agreement that was signed between the LGA and the State Government in 2008 led to a shared program of work that has received national and international recognition for its innovative and cohesive approach to climate risk management in both the mitigation and adaptation spheres.

Without this partnership and without the dedication and perseverance that councils have demonstrated to achieving their climate related goals, it is unlikely that the state would be in the leading position it finds itself in today. Councils continue to petition both the LGA and State Government to provide the support that they require to achieve their climate related goals.

The South Australian Regional Adaptation Program (RAP) is recognised both nationally and internationally as a leading approach. Its success has been the result of leadership delivered through the State and LGA partnership and through champions in the regions residing in councils, NRM and RDA Boards. All regions in the state will have undertaken an Integrated Vulnerability Assessment (IVA) and prepared an Adaptation Plan by the end of 2016.

Science to Solutions (StoS) is now in its second phase, and the response from the sector to the content and outputs of projects that have been planned has been extremely positive. As part of this work, the LGA will identify the key themes emerging from all regional adaptation plans and prepare a summary that will identify the highest priority actions required to deliver climate resilience across the state.

The LGA is currently working on concepts to present to the State Government for the development of a strategic framework for coastal risk management and are also contributing to planning reform through our work to critique climate related policies in the SA Planning Policy Library.

The LGA has supported the State Government on a range of mitigation activities that will ensure South Australia continues to lead the nation in the climate mitigation sphere. Examples include the Building Upgrade Finance program, of which the LGA is a main partner, facilitating the uptake of solar PV for councils and their communities and working with the CSIRO on our EnergyMark trials, which successfully demonstrated how energy use could be reduced across our communities.

The LGA is currently working with councils on a framework for the transition to sustainable street lighting technologies, and to increase the efficiency of Council buildings, services and fleet vehicles. The LGA is also developing new approaches to benchmarking energy usage and emissions data with a group of twelve councils seeking to learn from each other to further reduce energy and carbon outputs.

Councils remain committed to playing their part in reducing greenhouse gas emissions, while maximising the opportunities that a low carbon future will bring. Closer collaboration with the State Government on potential strategies for mitigation would be welcomed.

Moving Forward

It is critical that the State Government both recognises and responds to the needs of councils and their communities, while acknowledging the major role that the sector has played and will continue to play in the state maintaining a leading position for both adaptation and mitigation innovation.

Moving forward, the LGA would recommend that the State Government:

- identify resources and funding to effectively support implementation of adaptation activities, and advance these activities through its partnership with the LGA; and
- engage at an early stage with the LGA on state based mitigation opportunities to maximise outcomes.

Adaptation

The LGA recommends that the State develop a strategic planning and funding/financing approach to assist regions in the delivery of outcomes identified in the RAPs process.

The LGA has recently negotiated an additional two year funding agreement with the State Government to undertake actions in relation to StoS. The projects being managed by the LGA as part of this agreement represent the bulk of adaptation activities being carried out across the partnership.

Projects being managed by the LGA are:

1. facilitating implementation of RAPs;
2. integrating climate risk impacts;
3. delivering targeted training; and
4. review and reset of the program.

Failure to maintain the momentum and provide vital support to councils and other regional stakeholders currently engaged in the Regional Adaptation Planning (RAP) process will result in the leadership role of both the LGA and State Government being eroded. Plans will remain unrealised, and the opportunity to build resilience in our communities will be diminished.

Current resourcing within the Department of Environment, Water and Natural Resources (DEWNR) to facilitate the RAPs process and to support implementation of outcomes is insufficient. Funding and support for state wide adaptation activities is vital and is required as a whole of government approach, described further in this submission.

The LGA will be undertaking an analysis of the RAP outcomes as part of StoS to identify common themes and areas for priority action. As part of the new strategy being developed, it is essential that State Government identify additional resources for adaptation activities and funding for implementation of priority adaptation activities.

Mitigation

The LGA encourages early engagement with the Local Government Sector when progressing mitigation initiatives to ensure whole of sector buy-in and to maximise the benefit of outputs.

While the LGA encourages and supports the mitigation activities that have currently been the focus of State Government attention, it is presently unclear how the local government sector as a whole will benefit from them.

The LGA has worked with the State Government on several key mitigation projects (some of which are ongoing). Local government is the tier of government closest to the community. As such, it is crucial moving forward that the State Government engages early with the LGA, and with the wider local government sector when considering and progressing mitigation initiatives.

The LGA is best placed to ensure that the vast experience of the sector is incorporated into program design, and that the sector is appropriately consulted. Where whole of sector involvement is not required, the LGA can ensure that key learnings are disseminated across all councils and those opportunities are not lost to develop state-wide benefits.

Local government has already made significant gains (mentioned previously) towards reducing its energy and carbon outputs and transitioning to a low carbon future. The LGA is currently considering embarking on a number of new projects, including the establishment of a local carbon market to fund and procure carbon credits generated in the regions, from activities such as biodiverse planting and renewable energy opportunities.

The LGA sees significant social, economic and environmental gains in the states regions from the establishment of such a program.

Councils continue to seek engagement in existing initiatives, as well as input and support to develop new opportunities for collaboration. It is currently unclear what role the State Government envisages the local government sector playing in achieving emissions reduction targets and transitioning to a low carbon future.

In moving forward, clarification of the role of local government and a strategy for identification of future opportunities will be required.

Leadership

Leadership and strategic partnerships are essential in delivering state climate objectives. The LGA recommends the State Government considers shifting responsibility for climate into the Department of Premier and Cabinet and that climate is a key consideration for all state boards, committees and advisory bodies.

Councils are on the frontline in dealing with the impacts of climate change. They have a critical role to play in ensuring that particular local circumstances are adequately considered in the overall adaptation response and in involving the local community directly in efforts to facilitate effective change.

Councils are best positioned to identify and inform State Government about the impacts of climate change and the on-the-ground needs of local and regional communities, to communicate directly with communities, and to respond appropriately and in a timely manner to local changes.

However, councils have clearly identified that they require State Government to take a leadership role for strategic management of climate risk and resilience and to identify opportunities for the sector to both contribute to a reduction in greenhouse gas emissions and benefit from a low carbon future.

In particular, the Council representatives at the LGA consultation session identified the sector requires strategic leadership to:

- manage risks through a review and update of state planning, property and environmental strategy, policy and legislation to ensure an appropriate environment for effective adaptation by councils;
- support action planning and establish and implement monitoring and evaluation arrangements to ensure the adaptive management approach works as planned;
- work towards high level support and an increased obligation to act on climate risks from the Premier; and
- work with the local government sector to develop mitigation opportunities.

Feedback from the LGA Consultation Session

The LGA has compiled and consolidated the views expressed by councils across the state to provide a representative view on the opportunities and challenges currently being experienced across the sector.

Main themes discussed in the session were:

- strategic management of climate risk;
- implementation of priority adaptation actions;
- the adaptive management framework;
- partnerships;
- whole of government response;
- obtaining high level support;
- prioritising investment;
- emissions reduction targets; and
- energy efficiency.

Strategic Management of Climate Risk

The Adapt consultation paper provides a list of potential areas that the new climate change strategy could focus on. The LGA and Council representatives at the 7 October consultation session endorsed all of the areas listed as those in which further progress is required moving forward.

These areas mainly relate to driving the implementation of priority adaptation actions in RAPs, but the relationship between implementation of RAPs and a whole of Government approach (that was picked up by the consultation session) was also demonstrated by the next steps identified in the paper.

It is clear from this that the state and local government sector has a consistent view on the next steps for adaptation, which was welcomed. However, councils represented that resourcing and funding for adaptation activities had diminished and that the State Government needed to 'get back in the game', by elevating adaptation as a priority and securing commitment for implementation from the Premier.

Implementation of Priority Adaptation Actions

Council feedback identified the main elements required to successfully implement priority adaptation actions from the RAPs, which include:

- a process of strategic prioritisation;
- a process for action planning (including feasibility and risk assessment);
- provision of resources and funding;
- State Government goal setting for implementation (and not planning); and
- strategy/ policy alignment (as part of a whole of government approach).

It is recognised by RAP partners that all tiers of government require a robust process to determine resource allocation and prioritisation of effort. Some regions have already undertaken prioritisation and action planning processes. The State Government should provide input and endorsement to these processes in terms of advocating on behalf of regional partners for resources and funding.

It is recommended by councils that the LGA/ DEWNR develop a best practice method of prioritisation and action planning and that they support all regions to follow the method (post planning) to identify their priorities. This will support the State Government in developing a funding strategy for implementation of priorities.

This view is supported by the work undertaken by the Council of Australian Governments (COAG), which represents the most sophisticated work undertaken to identify existing obligations for managing climate risk (and climate change in general) published in 2012.

In this analysis, it is highlighted that *'Governments (meaning State and Territory Governments) should ensure that climate risks are appropriately factored into their management and funding of public assets'*. In particular, emergency management, transport, land-use planning, environment, health services and public housing should be managed through partnerships with stakeholders, through effective policy and legislation and equitable budgeting'.

Not precluding the fact that the State Government has an obligation to manage climate risks, and that this includes providing financial support, it was identified by councils that developing innovative finance mechanisms to tap into finance from business/ industry will also be a key aspect of how the state can afford to implement priority adaptation actions.

Current activities to research and develop finance mechanisms and test them in our regions should be further supported. Mechanisms that take advantage of Federal Government policy shifts, or that comprise alliances between states could be considered. Feasibility for Public, Private Partnership (PPPs) should also be explored, along with other models for partnering to achieve implementation outcomes.

The strengthening of legislation and state policies to emphasise the need to build the need for climate adaptation with risk management and resilience as core objectives is supported. Suggestions for how to achieve this include:

- The Climate Change and Greenhouse Gas Reduction Act should recognise the impact/ risk nature of adaptation planning;
- roles and responsibilities could be defined in the Climate Change and Greenhouse Gas Reduction Act;
- the objects could be refined to focus on risk and implementation;
- language could be strengthened by using words such as 'obligation' and 'requirement'; and
- monitoring and reporting requirements could be strengthened.

Other Acts may benefit from being amended to support both adaptation and mitigation measures. The local government sector would welcome the State Government identifying strategies that involve regulatory reform which can be adopted working in partnership with local government.

The main aim is to ensure that legislation properly addresses the liability of councils, provides clear guidance for decision making, confers powers (and funding) to undertake protective works and provides appropriate mechanisms for low carbon investment.

Baker and McKenzie in a report from 2012, commissioned by the Australian Local Government Association (ALGA) suggest the following strategies, which councils endorse:

- identify areas of potential legal risk and liability in relation to climate change, particularly in coastal areas;
- identify legal or other strategies to mitigate these risks;
- identify where legislation or policy frameworks create barriers to effective adaptation or promote maladaptation; and
- provide an assessment of areas where a national approach could reduce or remove these risks to councils.

In addition, the LGA recommends including in the strategy, the identification of where legislation or policy frameworks create barriers to effective mitigation.

With regard to coastal risks (the area identified with most liability risk by Baker and McKenzie,) the Coast Protection Board (CPB) has identified areas that require immediate risk mitigation works to be carried out. These risks are detailed in the RAPs and adaptation works have been prioritised but not yet funded.

Issues include severe flood risks in Port Adelaide and on the Yorke Peninsula, breaches of an ageing seawall in West Beach, levee maintenance and expansion in Port Augusta and significant coastal erosion issues in the South East. The CPB position paper released in May 2015 identifies between \$10-25 million of immediate high risk unfunded coastal management issues.

The CPB recommends that DEWNR prepare a ten-year programme of coastal management initiatives to address the issues they have identified, including securing the funding required to achieve the works required. However, through consultation on the Sea Level Rise Problem Definition Paper the sector has called for a well-informed State Government strategic plan for the management of sea level rise that goes beyond a program of coastal initiatives.

The LGA is currently working on concepts to present to the State Government for the development of a strategic framework for coastal for risk management. The LGA recommends the State Government commits to working with the local government sector to attain this goal.

Adaptive Management Framework

The LGA sees the further development of the adaptive management framework as vital to ensuring climate risk is strategically managed. The pathways approach taken in the majority of RAPs is only relevant if it is backed up by strong monitoring and evaluation controls.

Without monitoring and evaluation, it is a likely trigger and decision points will be missed, which will result in RAPs not achieving their aim of reducing vulnerability and building resilience.

An important point to note, is that monitoring and evaluation (and therefore adaptive management) can only be achieved if prioritisation and action planning has been undertaken to a level that is meaningful. It is recommended by the LGA that emphasis is placed on regions developing their plans through fully undertaking steps six and seven (action planning and monitoring and evaluation) of the Climate Adaptation Planning Guidelines.

Partnerships

The strength of the South Australian RAP process is based on its successful partnerships. Whether the sector agreements that were signed played a major role in those partnerships was a topic for debate at the LGA consultation session. The consensus was that they have not played a major role in creating and maintaining the partnerships.

Currently, sector agreements are voluntary and not required by law. The consensus from councils was that they have acted as window dressing to the regional partnerships that have been developed across the state. Without the agreements, it is likely that the same activities would have still taken place.

Councils represented that the process of developing and renewing sector agreements was seen as cumbersome and time consuming. Some agreements have expired, and councils have been negotiating renewals for (in some cases) over a year, without success. This has led to activities taking place without a sector agreement in place.

With the current arrangements in place, councils do not support the continuation of the use of sector agreements. Modifications are required (detailed below) to both process and status of the agreements for them to become an essential element of both developing and maintaining partnerships.

Thought should be given to:

- legally binding the signatories of the agreements to undertaking the agreed activities;
- reviewing and streamlining the process for developing a sector agreement; and
- considering different tiers of agreements depending on the sector and commitment being made.

It should be noted however that the role of sector agreements between the state and peak bodies/ associations is different to that of agreements between the state and regional partners, such as councils in the delivery of RAPs.

The LGA recognises the value of intergovernmental agreements, such as climate sector agreements in the delivery of agreed activities and promotion of partnerships at the Ministerial level. As such the LGA recommends that the state review the role of sector agreements and their appropriateness across the various partners for which they are intended.

Councils have identified that a perceived failing of the RAP process was in getting the business and industry sectors fully engaged. Obtaining buy-in from across sectors to support implementation is seen as a key aspect of strategic management of climate risk and activities. To further develop these partnerships, engagement should be immediately re-invigorated.

Councils support priority being given to adaptation actions relating to vulnerable members of the community but recognise the lack of involvement of community support agencies such as the Red Cross in the RAP process. These partnerships should be identified and fostered during the implementation phase to ensure the applicability of initiatives developed at the regional scale to local issues.

The LGA has recently undertaken a body of work with SA Health to align the relevant parts of both the RAP process and the Regional Public Health Planning process under the South Australian Public Health Act 2011. The outcome has been a mutual appreciation of the many overlaps in the bodies of work being undertaken by SA Health and DEWNR as part of their respective planning processes and a commitment to work together closely in the future.

LGA recommends that the State Government undertake further research to identify where strategic partnerships are required in business and industry, voluntary and support sectors and across Government departments.

Further research into 'other' partnership approaches would be welcomed. As previously mentioned, feasibility for Public, Private Partnerships (PPPs) along with other models for partnering to achieve implementation outcomes should be explored.

Whole of Government Response

A whole of government response is defined by the LGA as all State Government agencies working across portfolio areas to achieve a shared goal and an integrated response to climate issues.

Achieving this based on current modes of operation will represent a real challenge that is not unique to State Government. However, councils represented that if the State Government leads by example, local government will follow suit.

Councils highlighted the cross agency issues that they are currently facing and have suggested some priority areas for the Government to focus on in achieving a whole of Government response.

These issues are identified as:

1. outdated or misaligned policy and governance frameworks;
2. lack of high level support/ commitment; and
3. prioritising investment.

Outdated or Misaligned Policy & Governance Frameworks

It was identified by Council representatives at the LGA consultation session that there is a misalignment between overall strategy, policy and regulatory frameworks and climate goals. The best example would be coastal management, where a diverse range of strategies, policies and regulations must be taken into consideration for appropriate risk management to occur.

A main finding of the 'Sea Level Rise Problem Definition Paper' commissioned by the LGA, CPB and DEWNR in 2014, was that interactions from the planning strategy and those relating to adaptation, coast protection, natural resource management, emergency management and asset management are currently not clear.

In terms of governance, there is currently no structure to ensure that planners incorporate the range of new issues that have arisen in recent years. Existing structures made it difficult to incorporate new thinking into current processes and to mainstream climate considerations at any meaningful level in overall State Government strategic planning processes.

To address these issues, opportunities for re-aligning strategies, policies and regulations and setting up governance processes that enable a) an efficient and cost effective shift to a low carbon economy and b) developing and integrating an effective strategic risk management framework, must be identified by the State Government.

The consensus from the sector is that the planning system represents the biggest opportunity to influence alignment of strategies, policies, regulations and governance structures to support the climate mitigation and risk and resilience goals stated above.

The local government sector and the LGA anticipated the reform of the planning act to be the start of a transformative process of legislative, strategic and policy alignment. It is recognised that this will be an iterative process, and the LGA has paid close attention to the planning reform process to identify if the reforms assist in achieving climate goals.

The LGA believes that the proposed bill does very little to support the states climate adaptation risk and resilience objectives.

The objects of the Planning, Development and Infrastructure Bill are strongly focused on the economic aspects of development, and there is concern that social and environmental objectives are given little regard. The LGA assumes that future development policy will be weighted towards economic outcomes rather than with seeking social and environmental goals as well as risk management principles and resilient communities.

The LGA strongly recommends that the goals for adaptation and mitigation are articulated in the objects of the Planning and Development Act. In addition, it is imperative in Part 5 (Statutory Instruments) that climate risk and resilience factors are taken into account in the preparation of:

- Principles;
- State Planning Policies;
- Integrated Planning Policy;
- Regional Plans;
- Establishment of the Code; and
- Design Guidelines.

There is also concern that the planning reforms will result in decreased powers of direction for the Coast Protection Board and the Environmental Protection Authority over development applications where coastal hazards are a factor. There are also no mechanisms for improved zoning of sensitive coastal features or coastal hazards.

There is likely to be a range of other pieces of legislation that don't align with climate objectives, and that are actively working against our shared climate vision. The State Government must determine a program of identification and review of existing legislation, strategy, policy and regulation (as it applies to enabling a shift to a low carbon economy and the effective management of climate risk/resilience) and start of process of review and alignment.

Governance frameworks also require modification to allow incorporation and consideration of a range of issues that they were not originally designed to tackle. In particular, it was suggested at the LGA consultation session that there needs to be greater visibility of the linkages between policy and governance, and more accountability for demonstrating progress against its strategic goals in function specific and project based outputs.

Aligning of policy and governance frameworks will also assist in mainstreaming consideration of climate risks into the strategic and operational planning processes of both State and local government. The requirement for achieving this is featured prominently in the findings of the Science to Solutions research and is something the LGA is working towards.

It is however, recognised that mainstreaming will not be achieved unless a whole of government approach is taken to strategic management of climate risks.

Obtaining High Level Support

The Department of the Premier and Cabinet (DPC) provides central agency leadership on key issues that affect South Australia's future prosperity. The consensus from the sector is that climate change represents a threat to the prosperity of the State as a whole, and that the Premier needs to take the lead in tackling climate risks, providing strategic leadership and in developing opportunities related to a low carbon future.

The PCCC recommends that the DPC takes a lead on the development of cross- agency initiatives to respond to the Council's advice. The local government sector endorses this approach as an effective way to drive strategic outcomes and secure the high level support that is required moving forward.

Local government would also suggest a review of the benefits of overall responsibility of the climate change portfolio returning to the DPC. This may result in the high level support and strategy development that is required to properly align climate concerns across State Government legislation, strategy and policy and assist in achieving a whole of government approach.

Prioritising Investment

The LGA will be undertaking an analysis of the RAP outcomes as part of StoS to identify common themes and areas for priority action. Councils have also advocated the LGA / DEWNR developing and coordinating a robust prioritisation and action planning process with the regional partners as an extension to the planning process.

The expectation from the local government sector is that based on these strategic prioritisation processes that the State Government will set a program of investment that supports implementation of adaptation actions, setting of emissions targets and investment.

The LGA has already approached the Minister on this topic and he is expecting a report on the prioritisation process.

Emissions Reduction Targets

The local government sector endorses the increase in targets for renewable energy investment and production and greenhouse gas emissions reductions. The sector supports the PCCC recommendation of the State Government to immediately start developing a bi-partisan agreement for deep cuts in emissions by 2050 and that the targets should be legislated and binding.

However, the suggestion from the PCCC of developing an interim target for 2025 may not go far enough to secure short-term reductions in emissions. In addition, the metrics used to measure reductions may not be representative of the effort required to prevent significant climatic shifts.

The consensus from the local government sector is that options for initiatives that achieve short-term cuts should be explored and prioritised, and that alternative targets should be considered for achieving short term cuts. Targets could be set for sector carbon reductions towards neutrality, greenpower purchase or abatement (for example).

It was recognised that a large proportion of emissions come from stationary energy generation, industry/ business, transport and households. Ideas for how the local government sector can affect those sectors are given further on in this submission. However, the main areas of local government influence were identified as:

- sustainable street lighting;
- sustainable procurement;
- energy efficiency of Council buildings, fleet and operations;
- further development of Building Upgrade Finance;
- establishment of a Low Carbon Market (carbon credits and offsets);
- partnering on Carbon Neutrality Opportunities; and
- localised low emissions distributed energy generation.

The sector looks forward to fleshing out the opportunities listed above, to maximise local government input into achieving significant emissions reductions.

In particular, transitioning to sustainable street lighting will provide significant energy reduction opportunities and while driven by councils in partnership with SA Power Networks the support of the State Government is also deemed critical. As previously stated, the local government sector has undertaken a substantial amount of work towards achieving sustainable street lighting, but would welcome State Government support to ensure that it becomes a reality.

Abatement was a topic for discussion at the LGA consultation session, with one representative stating that 'abatement has fallen off the State Government agenda, and it needs to reinvigorate it'. Examples were given for how opportunities for re-investing in forestry are being eroded by State Government selling off land, or through poor land-use planning decisions.

The point was made that abatement through forestry could result in significant gains if investment is made, along with other types of green infrastructure such as wildlife corridors, parkland connections landscape controls for privately owned land, and planting trees in place of power poles where power lines have been put underground.

Energy Efficiency

Feedback on energy efficiency from councils has been based around 3 questions;

How can local government incentivise individuals to switch to greener forms of transport?

In terms of sustainable transport, councils advocate for community design features that incorporate walking trails, shading, water access and other design features that promote behaviour change. They plan walking and cycle trails and try to ensure services are in walking distance to the majority of households.

State Government planning policy should facilitate councils in maximising outdoor comfort and connectivity in neighbourhoods to reduce the need to drive. Councils also advocate carpooling for its employees and are replacing high emission fleet and service vehicles with hybrid, electric and hydrogen designs (as they become feasible). Councils would welcome State Government incentives to catalyse the process of fleet renewal towards more efficient vehicles.

State Government should work closer with councils to plan public transportation (stops, routes and frequency). Thought was given to increasing parking restrictions in areas that are well served by adequate walking and cycle trails and public transport. Councils would welcome State Government incentives to improve public transport.

The feasibility of 'greenpower' or 'carbon offset tickets' should be explored for climate conscious public transport users, and the State Government should consider tax incentives for cars with smaller engines to accommodate those who have to drive but want to reduce their carbon footprint.

How can local government capitalise on opportunities for energy efficiency at industry and household levels?

Councils remarked that the local government sector has a long history of providing communities with energy efficiency educational materials and hosting community sessions, but these kinds of educational programs are the first to get cut. Councils are looking to State Government to partner with local government to undertake larger educational programs, or to provide funding for the continuation of existing smaller initiatives.

Waste categorisation and re-use has resulted in significant reductions in other states, and opportunities for councils in SA to capitalise on this should be explored.

Developing opportunities to achieve 100% household solar photovoltaic (PV) levels was seen as achievable. Councils would welcome ideas for how councils and State Government could incentivise private landlords and social housing providers to install panels for non-owner occupiers.

Facilitating the transition of communities off grid was a concept that was discussed in some detail. Councils are looking to future energy challenges and see community and household generation and storage as imminent technologies that should be embraced.

Councils recommend State Government look to incentivise household energy efficiency, generation and storage. State Government should be actively setting a vision for state-wide energy needs by working with local government and SA Power Networks to look at the feasibility of supporting communities with their future energy needs.

With the high uptake of solar PV, the next logical step would be investing in the infrastructure and technology to achieve this. There is also precedent for trailing this in other states.

Western Power has recently piloted taking small communities off grid so that it can save money on network upgrades and extensions. The pilot will be testing stand-alone-power systems (SPS) located within individual houses. The houses would maintain their connection to the grid until the pilot proves SPS is technically reliable and financially sound. The LGA recommends State Government look towards developing similar pilots.

Councils are no longer primarily concerned with roads, rates and rubbish. The sector is becoming increasingly more involved in community economic development and in ensuring its financial sustainability. The sector has built international trade partnerships and is regularly involved in initiatives to attract industry and jobs to their areas to foster strong economic development.

The sector sees the potential for significant gains for shifting to a low carbon future. Councils endorse the State Government in looking at each point raised in the low carbon strategy to identify (for local government):

- where the local government sector can work with the state and other key stakeholders to maximise outcomes;
- opportunities for attracting CleanTech industries; and
- opportunities for diversifying our employment base and exporting our skills.

The suggestion from the sector is that a 'Local Government Mitigation Strategy' is required to flesh out the role and opportunities that will arise, and for the sector to be seen as a key player in a low carbon strategy for the state.

The LGA looks forward to liaising with the State Government to discuss this idea further.

How can local government capitalise on opportunities for greater energy efficiency?

From a Local Government assets and services perspective, the sector is already advanced in measuring and monitoring its emissions. Efficiencies have been made across Council buildings, fleets and services, and twelve councils have recently been involved in a benchmarking project to identify where further improvements can be made.

The sector has also introduced sustainable procurement and travel policies that ensure staff make a low carbon choice in purchasing goods and services. Councils also routinely purchase greenpower, however it should be noted that councils are trending towards abandoning greenpower in favour of investing the 'premium' paid into local energy efficiency / renewables generation.

It is accepted that there are still efficiencies to be made, and the sector would suggest further discussion with State Government to develop ideas for how this can be achieved. Ideas for improvement included:

- offsetting electricity use;
- becoming carbon neutral (or promoting carbon neutrality); and
- investing in new technologies.

State Government should lead by example and ensure that it sets targets for its own energy use and carbon emissions. This includes improved targets for the energy performance of its own buildings, and considering the carbon footprint of project delivery and the services it is responsible for.

As identified during the LGA consultation session, there is a perception that the State Government does not lead by example (particularly) in major infrastructure projects where energy efficient solutions are not fully considered and environmentally sensitive designs are not chosen. This could be a consequence of misalignment of strategy, policy and regulation (discussed above), which will be improved by taking a whole of government approach to infrastructure design and implementation.

State Government could also consider increasing mandatory standards and regulations for energy efficiency of new and refurbished buildings.



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