

Climate Change Policy
City and Environment Directorate
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18 March 2026

Dear Sir/Madam,

RE: ACT Climate Change Strategy for 2026–35

The ACT Council of Social Service (ACTCOSS) welcomes the opportunity to provide comment to help inform the next ACT Climate Change Strategy and its supporting short-term action plans from 2026 to 2035. ACTCOSS is the peak body for not-for-profit community organisations in the ACT. Our membership includes the majority of community-based service providers, along with a range of community associations, networks, and organisations that support people on low incomes and those experiencing multiple, intersecting forms of disadvantage. We work in partnership with the community sector and Government to advance the vision of an inclusive Canberra in which no one lives in poverty. ACTCOSS has significant expertise in the areas of equitable decarbonisation, climate change resilience and adaptation. We are national leaders in understanding the role of the community sector in climate adaptation.

This submission is co-signed by Energy Consumers Australia (ECA). ECA are a not-for-profit organisation established by the Council of Energy Ministers in 2015 to advocate for the interests of energy consumers. They want to see an energy system that is fair, affordable, reliable and meets the needs of everyone.

In our submission we argue that the impacts of climate change and climate change mitigation measures are not evenly distributed in society. As with most crises, there is an outside effect for those already experiencing socioeconomic disadvantage, like health vulnerabilities, insecure housing, and social isolation. As climate hazards increase in frequency and intensity, it is critical to establish equitable social and physical infrastructure that support those most vulnerable to these events.

We are encouraged that the ACT Climate Change Strategy places a strong emphasis on equity and resilience. However, for the strategy to succeed, much more work needs to be done to ensure that equity is translated clearly into action. As we demonstrate in section three of our submission, an equitable vision poorly implemented can still lead to adverse outcomes for those who need the most support.

This submission also calls out the need for the strategy to recognise and appropriately **resource the ACT community sector as a critical partner in mitigation, adaptation and social recovery**. The sector plays an integral role supporting Canberrans experiencing disadvantage, and in social recovery in the aftermath of disasters. The sector also plays a key role in amplifying the concerns of vulnerable ACT residents during the development and implementation of decarbonisation measures to ensure a more just transition. The future of climate action in the ACT will invariably involve the community sector to a significant degree and this ought to be appropriately reflected in future planning.

We thank the committee for the opportunity to provide input on the Climate Change Strategy for the ACT.

Recommendations

Recommendation 1: Equity must translate into well-planned and adequately funded measures, rather than remaining a high-level principle. The final Strategy and accompanying action plans must outline:

- Specific, measurable objectives, not merely broad statements of aspiration;
- Timelines, with final and interim goals that guide coordinated action across government and sectors;
- Transparent mechanisms for accountability, including regular public reporting; and
- Clear links between actions, equity outcomes and wellbeing indicators.

Recommendation 2: The strategy needs to articulate the role of government in creating the enabling conditions and incentives needed for system-wide change. The Strategy must acknowledge that the Territory has already missed its interim 2025 emissions target, and therefore stronger government leadership is required to shift incentives, remove barriers and drive equitable climate preparedness. Without this, there is a risk of implicitly shifting responsibility, and cost, to individuals and households, despite recognising that many cannot afford to transition or adapt on their own.

Recommendation 3: For the Strategy to succeed, it must explicitly recognise, fund and partner with the community sector as a central delivery mechanism for climate resilience across the Territory. The sector's expertise, trusted relationships, service reach and ability to support people with the most complex needs position it as an integral part of the frontline climate-resilience system, not an adjunct to it.

Recommendation 4: Ensure equity in the energy transition by:

- Targeting financial support to households based on need, ensuring those with the least capacity to pay receive upfront assistance to transition;
- Strengthen consumer protections to ensure household access to clean, reliable energy is not hampered by gaps in the consumer protection framework and inadequacy of dispute resolution mechanisms;
- Expanding the depth and reach of tailored transition supports delivered by trusted community organisations to ensure vulnerable and hard-to-reach households can transition off gas in time;
- Enabling strategic advocacy to ensure the interests of households vulnerable to energy harm are prioritised during the energy transition process and reforms affecting their access to, and use of, energy;
- Ensure groups such as renters who do not have the power to initiate the energy transition process in their homes or install the upgrades needed to maximise the benefits of a renewable energy dominant system are not left behind;
- Improve quality of reporting on impacts of decarbonisation measures on vulnerable households;
- Reduce reliance on regressive cost recovery mechanisms to fund decarbonisation measures.

Recommendation 5: Better account for intergenerational equity in the strategy by:

- Embedding intergenerational equity within Theme 1, so that decisions guiding the ACT's response to climate change must consider the impacts on young people and future generations;
- Introducing health as an explicit theme within the strategy, to ensure that actions to address climate change also create positive health outcomes, and that our social and health systems can adapt to the increasing burden of a warmer, drier and more volatile climate;

- Ensure that age-appropriate climate education is a part of the school curriculum and that children are empowered with the knowledge needed to navigate their future, including mitigating and adapting to the impacts of climate change, including opportunities to directly work on nature-sustaining projects;
- Ensure that the strategy includes tools to help schools adapt to a changing climate, including safe classrooms and outdoor learning spaces.

1 – From principles to implementation

ACTCOSS welcomes the strong emphasis in the discussion paper on **equity, wellbeing and resilience** as foundational elements of the ACT Climate Change Strategy 2026–35. It acknowledges that not everyone can afford to transition or adapt on their own, and that priority groups, including people with lower resilience, fewer financial resources, or limited community support networks, must be actively heard and meaningfully included in shaping climate responses.

This framing is both necessary and timely. Climate impacts are not distributed evenly, and without targeted action, climate change will deepen existing inequities. As climate hazards intensify, their effects compound for people already experiencing socioeconomic disadvantage, health vulnerabilities, insecure housing, or social isolation. These inequitable impacts are consistent with the findings of the 2025 National Climate Risk Assessment (NCRA), which highlights that **existing disadvantage and contextual vulnerabilities operate as major amplifiers of climate risk.**¹

While a strategy that places equity and wellbeing at its centre is critical, intention alone is not enough. The current discussion paper provides vision but lacks the concrete, measurable goals necessary for the community to understand how equity commitments will be operationalised. Without explicit long-term targets and clearly defined intermediate milestones to guide action, the Strategy will be difficult to implement. In particular, there will be ambiguity for public servants and civil society partners. Milestones also enhance progress tracking and evaluation.

To be effective, the final Strategy and accompanying action plans must outline:

- Specific, measurable objectives, not merely broad statements of aspiration;
- Timelines and interim goals that guide coordinated action across government and sectors;
- Transparent mechanisms for accountability, including regular public reporting; and
- Clear links between actions, equity outcomes and wellbeing indicators.

Equity must translate into well-planned and adequately funded measures, rather than remaining a high-level principle.

The Strategy must recognise the balance of responsibility

The discussion paper places considerable emphasis on actions required by individuals, communities and businesses, but gives insufficient attention to the **role of government** in creating the enabling conditions and incentives needed for these actors to contribute to system-wide change.

The Strategy must acknowledge that the Territory has **already missed its interim 2025 emissions target**, and therefore stronger government leadership is required to shift incentives, remove barriers and drive equitable climate preparedness. Without this, there is a risk of implicitly shifting responsibility, and cost, to individuals and households, despite recognising that many cannot afford to transition or adapt on their own.

¹ Australian Climate Service 2025. Australia's National Climate Risk Assessment Report.

ACTCOSS was particularly concerned with the 'What you can do' sections of the Discussion Paper. While civil society, including households and business, has a role to play in the Strategy, it will continue to act in the way that it has without a change to incentives. The ACT Government has a critical role to play in shifting incentives for civil society that seems to be overlooked in these sections. ACTCOSS strongly encourages the Government to view the amendment of these sections as an opportunity to consider how it can change incentive structures to change civil society's behaviours. Without this consideration, the Strategy will merely document possible actions by civil society, rather than influencing its actions for the better. Rethinking the Government's approach in this space is crucial for the Strategy's success.

Well-funded action and prioritisation is essential

Delayed action also carries significant fiscal consequences for the ACT Government. Early and well planned adaptation substantially reduces long term costs and risks, whereas delayed or incremental action leads to higher overall losses, escalating financial pressures and reduced effectiveness of future adaptation options. Without this urgency, the ACT risks a dual burden: **deepening inequality and rising long term fiscal stress**, as emergency responses, health impacts, infrastructure failures and service disruptions become more frequent and more costly.

Without prompt action, compounding pressures will outpace adaptation efforts, leaving those with the fewest resources facing the highest risks. This includes exclusion from electrification and higher energy costs, greater exposure to extreme heat and smoke, and declining access to essential services

In this context, ACTCOSS strongly supports the Strategy's recognition that climate action must be inclusive, fair and grounded in community needs, but this commitment must translate into action with immediate and adequately funded measures. **Equity delayed is equity denied**. Ensuring that supports and incentives are targeted to the people and communities, particularly those who face the most severe or compounding risks must happen now, not once climate pressures intensify further.

2 – Community sector

Given this commitment to equity and resilience, it is essential that the Strategy recognises and appropriately resources the **ACT community sector as a critical partner in mitigation, adaptation and social recovery**. This is notably absent from the current discussion paper, despite extensive feedback provided during earlier consultation processes with key stakeholders. The omission is concerning and risks overlooking one of the most important levers for delivering equitable climate outcomes.

The ACT community sector is a core component of the Territory's social infrastructure. The government already relies on the sector to help deliver decarbonisation measures, protect priority populations both during chronic climate pressures and acute climate-related emergencies.

The community sector delivers functions that directly align with the Strategy's stated equity and resilience objectives, including:

- **Maintaining essential services during and after disasters**, ensuring continuity of supports for people who cannot otherwise meet basic needs.
- **Reducing underlying drivers of vulnerability**, which the NCRA identifies as essential to lowering long-term climate risk—precisely the core business of the community sector.
- **Assisting people exposed to multiple, intersecting risks**, where climate hazards combine with poverty, disability, age, health conditions, insecure housing, family violence or social isolation.
- **Enabling community-centred social recovery**, in line with the ACT Social Recovery Framework, through trusted local relationships and deep understanding of community needs and contexts.

The ACT cannot achieve its vision of an equitable, climate-ready future without a strong, well-resourced and climate-prepared community sector. It is therefore deeply disappointing that the discussion paper barely acknowledges the community sector. For the Strategy to succeed, it must explicitly recognise, fund and partner with the community sector as a central delivery mechanism for climate resilience across the Territory. The sector's expertise, trusted relationships, service reach and ability to support people with the most complex needs position it as a core part of the frontline climate-resilience system, not an adjunct to it.

3 – Translating plans to action

To demonstrate how measurable, equity focused targets can be embedded across the Strategy's themes, the following case studies provide practical examples of how high-level climate commitments can be translated into concrete, timebound and evidence-based actions.

3.1 – Equity in navigating the energy transition

The energy transition has entered a critical phase. Reforms progressed over the next decade will enable the transition to a renewable energy-generation system, shaping how energy is priced, regulated, and consumed in the ACT. These reforms will directly affect household energy costs, energy hardship incidence and severity, and consumer protections.

The reforms will be progressed by the Territory government through its legislative mandate, intergovernmental cooperation mechanisms, and supporting policies and programs. It will also be progressed by independent bodies operating under energy laws adopted by the ACT. Together, these reforms represent the most significant transformation of the energy system since the establishment of the National Energy Market in 1998.

At present, reform processes are dominated by well-resourced actors that seek to limit energy business exposure to new energy system risks and transition costs. In contrast, actors well-placed to represent the concerns of people most likely to experience energy harm remain underrepresented in formal consultations and informal engagement processes. This underrepresentation stems from resource constraints, and reliance on project-based funding models ill-suited to strategic and sustained advocacy.

This imbalance creates a form of procedural inequity, in which those most likely to be harmed by inequitable energy settings are least able to influence their design. This materially increases the risk of reform settings that place the burden, complexity, and volatility associated with the transition onto households, rather than energy businesses that are better equipped to manage them.

The impacts of ill-designed reform settings are likely to fall most heavily on low income and vulnerable households. Many cannot afford the upfront cost of electric appliances, home upgrades, or smart technologies that make clean energy cheaper over time. Others are unable to benefit from reforms like time-of-use pricing because shift work, caring responsibilities, insecure housing, or limited flexibility constrain when they can use energy. Without appropriate intervention, market reforms intended to improve efficiency can instead penalise those with the least choice.

When households struggle to afford or navigate the evolving energy system, trust erodes and resistance grows, making electrification, gas phase-outs, and other emissions-reducing reforms harder to deliver and sustain politically.

In this context, an equitable climate strategy requires:

Tailored financial supports: While some groups may be able to navigate the change with limited financial help, others will require deeper financial assistance such as fully subsidised gas cooktops and heating systems to

ensure they transition off gas. Level of financial support offered by government must be commensurate with level of need.

Increase in depth and reach of tailored transition supports delivered by trusted actors.

While some households may be able to navigate the energy transition with existing levels of support, others will require more intensive and relational forms of assistance, such as case management, trusted intermediary support, and in-home advice.

For vulnerable and hard-to-reach cohorts, this assistance is best delivered through organisations and programs already embedded in local communities. These organisations have established relationships with trusted cohorts, a deep understanding of the challenges they face, and existing service delivery platforms that can be leveraged to initiate transition conversations, identify when electrification may be beneficial, support access to government programs, enable uptake of new services such as time-of-use tariffs, and assist households to navigate the process from initial consideration through to implementation.

As the ACT's decarbonisation target approaches, existing programs that adopt this approach will need to be scaled up to enable more organisations to deliver support and to increase the depth of assistance required for a tailored approach.

Limited reliance on household energy bills to fund decarbonisation measures

Continued reliance by decision-makers on household energy bills to recover the costs of decarbonisation measures, detrimentally impacts the wellbeing of persons vulnerable to energy hardship. There must be adequate consideration of the cumulative impact of these policies on the ability of lower-income households to access an essential service, or a commensurate expansion in measures to limit the financial burden of such regressive cost recovery mechanisms,

Ensure the concerns of ACT residents vulnerable to energy hardship are reflected in reforms affecting their access to and use of energy.

Existing risks of inequitable reform settings and policy prioritisation during the energy transition must be addressed by enabling strategic and sustained advocacy to promote the interests of vulnerable energy users in reform processes shaping their experience of a renewable energy-dominant system.

A priori conditions for strategic and sustained advocacy include:

- Sustainable, long-term funding arrangements that enable consumer advocacy organisations to engage flexibly, consistently across multiple, concurrent reform processes, independent of short-term project cycles;
- Early, ongoing, and meaningful access to both formal and informal decision-making forums, including those where problem definition and policy options are first shaped;
- Institutional recognition of the value of consumer perspectives;
- Mechanisms to support coordination across consumer organisations and jurisdictions, enabling efficient use of limited resources and amplification of key insights;
- Timely access to relevant data, modelling, and assumptions underpinning reform proposals, including those developed through informal or pre-consultation processes;
- Resourcing for direct engagement with households experiencing or at risk of energy hardship, ensuring advocacy positions are grounded in current and diverse consumer experience;
- Access to expertise required to engage with well-resourced vested interests on an equal footing

As the body with ultimate responsibility for the legal and institutional framework through which the current reforms are being progressed the ACT Government bears responsibility for ensuring the new energy system meets the needs of vulnerable ACT residents and addressing structural power imbalances that increase the risk of inequitable reform settings.

Improve quality of reporting on impacts of decarbonisation measures on vulnerable households.

Ensure mandated cost benefit analysis of government policies and programs or reporting on the experiences of vulnerable households are grounded in robust data and consultation. Benefits of particular programs should not be merely imputed, and costs should not be underestimated. Doing so risks harm to vulnerable households by rendering issues they may face and need for support measures required invisible.

3.2 – Urban heat island prevention

The ACT has a climate-inspired objective for 30 per cent of the ACT to be covered by tree canopy by 2045. The target is aligned with the latest research. For example, an Australian study estimated that raising tree canopy cover from less than 10 per cent up to 30+ per cent could save AU\$193 per person annually, and AU\$569 annually for individuals with a history of cardiovascular-related hospital admissions.² Another Australian study found that exposure to 30+ percent tree canopy (compared with 0-9 per cent) was associated with 31 per cent lower odds of psychological distress.³ There are great positive benefits to increasing tree canopy coverage in the ACT.

However, as we have highlighted in this submission, greater attention needs to be paid to implementation, action plans and interim milestones. The 2025 Urban Tree Canopy Coverage Report shows that canopy cover in the ACT declined between 2020 and 2025. There are no interim targets nor any measures that consider heat-vulnerability nor the geographic spread of that canopy, it is merely a blanket target for the territory. The absence of more detailed planning has a clear and direct negative impact on equity. For example, a more detailed approach might have considered the following:

- Areas such as town centres, parks and playgrounds, and key active-travel routes could have higher canopy targets given their role in reducing exposure;
- Targets could have been (and could still be) set to align with heat-vulnerability data, rather than applying a blanket 30 per cent across the ACT;
- There could be interim heat-mitigation measures in suburbs/areas with low existing canopy before 2045, especially newer suburbs where residents face long delays before new plantings provide shade and heat relief;
- The ACT could explore investment in urban green spaces to maximise health co-benefits and reduce long-term population health costs, especially for vulnerable groups;
- Better education, guidelines or incentives around thermal-performance on urban materials (e.g., phasing out high-heat-retention materials such as dark roofs, black plastic or rubber surfacing, and promoting light-coloured, reflective materials for paths, rooftops, and streets).

All of this demonstrates the negative impacts on equity that can occur when a high level strategy does not fully account for implementation. It illustrates that detailed action plans should thoroughly incorporate equity principles.

² <https://pubmed.ncbi.nlm.nih.gov/38490071/>

³ <https://jamanetwork.com/journals/jamanetworkopen/fullarticle/2739050>

4 – Intergenerational equity and accounting for intersectional impacts of climate change

The strategy sets the direction for the next decade of climate policy in the ACT, ensuring that we're creating a future environment in which today's children can prosper. This is why we need an intergenerational Duty of Care on climate included in the ACT's Climate Change Strategy. Recognising intergenerational equity as a key consideration in climate policy is an important tool to ensure the government is accountable to young people and future generations when making decisions that impact the ACT's response to the climate emergency.

1. Embedding intergenerational equity within Theme 1: Equity, wellbeing and resilience, so that decisions guiding the ACT's response to climate change must consider the impacts on young people and future generations;
2. Introducing health as an explicit theme within the strategy, to ensure that actions to address climate change also create positive health outcomes, and that our social and health systems can adapt to the increasing burden of a warmer, drier and more volatile climate;
3. Ensure that age-appropriate climate education is a part of the school curriculum and that children are empowered with the knowledge needed to navigate their future, including mitigating and adapting to the impacts of climate change, including opportunities to directly work on nature-sustaining projects;
4. Ensure that the strategy includes tools to help schools adapt to a changing climate, including safe classrooms and outdoor learning spaces.

Further engagement

If you would like to discuss any of the issues raised in this submission please contact Ms Natali Koerbel, Senior Policy Adviser at ACTCOSS, at policy@actcoss.org.au or on (02) 6202 7200.

Yours sincerely



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