

25 July 2024

Department of Infrastructure, Transport, Regional Development, Communications and the Arts
GPO Box 594
CANBERRA ACT 2601

Submitted: <https://www.infrastructure.gov.au/>

Dear Sir/Madam,

Re: Transport and Infrastructure Net Zero Consultation Roadmap

On behalf of our members, the Victorian Greenhouse Alliances (VGA) are pleased to provide this response to the *Transport and Infrastructure Net Zero Consultation Roadmap*. The VGA are formal partnerships of local governments and statutory agencies driving climate change action across Victoria's municipalities. The VGA deliver regional mitigation and adaptation programs that provide economies of scale and enable projects typically beyond the reach of individual councils and agencies. Our project work is complemented by targeted advocacy, capacity building and regional partnerships.

We urge the Department to consider the following recommendations:

1. *Adopt science-based targets aligned with limiting warming to 1.5°C and linked to national and sectoral carbon budgets*

We have been actively engaging with the Department of Climate Change, Energy, the Environment and Water (DEECCW) and the Climate Change Authority (CCA) regarding the Net Zero Plan and have been advised that the government will not adopt science-based targets and budgets in their approach.

We strongly urge the government to reconsider this decision. Failure to do so will be a significant missed opportunity and will undermine the credibility of the plan. Diluting a science-based target on the speculative grounds that Australia's export economy might be disadvantaged (or other political justifications) is unacceptable as it will lock the country's emissions trajectory in to an unsafe and unliveable climate.

Australia must do its 'fair share' in the global effort to address climate change, with a rapid transition to zero emissions or below across all sectors. Adopting a carbon budget is the most appropriate way to achieve this and provides the most scientifically robust methodology over a targets and timetable approach. A carbon budget also allows for funding and accountabilities to be allocated to specific emission sources and those best placed to deliver the required abatement. The progress of supporting actions must be quantitatively monitored and reported, so levels of ambition can be adjusted over time.

2. *Establish a multilevel governance model for setting climate policy and allocating resources towards reducing emissions and adapting to climate change impacts*

As the risks and opportunities of climate change become increasingly clear, it is imperative that all levels of government work well together to accelerate the transition to zero emissions or below and to strengthen community resilience. The consultation paper acknowledges this: 'Collective action is needed to reduce transport emissions. The Australian Government will continue to work collaboratively with all levels of government, the community and industry to reach net zero' (p79)'.



To meet this challenge, the current fragmented approach to policy, funding and resourcing must be addressed. The *Many Hands Makes Light Work*¹ report identified that a new approach to climate governance is required to empower all spheres of government to fulfil their climate ambitions by promoting effective coordination between and across all levels of government.

This 'multilevel governance' approach is intended to turbocharge climate action and give those on the frontlines a seat at the decision-making table. Energy Consumers Australia have made the same recommendation to government in their *Stepping Up*² report, which calls for the creation of a new national partnership across all levels of government with the objective of ensuring an orderly and equitable shift to all-electric homes.

As a first step, we call for the establishment of an 'accord' between the three tiers of government that defines common objectives to strengthen climate mitigation, adaptation and resilience. The accord should also underpin the implementation of the Coalition for High Ambition Multilevel Partnerships for Climate Action (CHAMP) commitments made at COP28.

3. Support councils to facilitate and unlock abatement within the transport sector

Avoiding unnecessary travel should be the first priority of the roadmap. Local governments are investing significant time and funding into the staffing, planning, and deployment of interventions aimed at improving the uptake of active transport modes. These approaches are already having a significant impact but need to be scaled-up through additional resources and funding support.

Increasing the adoption of walking and cycling involves a mix of supportive information provision, statutory planning reform and quality infrastructure. The construction of infrastructure comes at a significant cost to councils. The identification of complementary scenarios, in which the combination of planning, infrastructure and information can increase the use of active transport modes, can guide decision-making and capital funding allocation.

There are many approaches to increasing active transport. These are outlined in depth in individual council transport plans and generally include everything from behaviour change programs in schools and the community, traffic-calming measures, bike riding confidence courses, to lighting for walking tracks. Implementing dedicated infrastructure (such as physically separated walking and cycling paths and driving and cycling road lanes) is a key mechanism to promote mode shift from private vehicles to active transport.

While the implementation of EV charging infrastructure is not universally recognised by councils as their responsibility to fund and implement, many councils do however lead and support the installation of these chargers in their municipalities. Regional and rural councils particularly require external funding or market intervention to install EV chargers to enable EV journeys throughout Victoria's country regions. In many parts of rural and regional Australia, significant upgrades to electrical infrastructure will also be needed to support electric vehicle charging.

If supported and resourced adequately, councils can drive emission reduction through a range of other approaches including:

- Strategic planning to identify land available for electric vehicle charging points, parking spaces, or encouraging EV charging points in new developments in certain zones
- Support for / rolling-out public EV charging infrastructure at council facilities, key community locations, employment hubs and regional journey paths and destinations

¹ Melbourne Centre for Cities, *Many Hands Make Light Work* final report, July 2023 ([link](#))

² Energy Consumers Australia (ECA), *Stepping Up: A smoother pathway to decarbonising homes*, August 2023 ([link](#))

- Working with the community to support the uptake of car-share services and other mode-shift opportunities enabled by council education and behaviour change programs
- Strategic planning to enable 20-minute neighbourhoods that assist people to meet most of their daily needs within a 20-minute return walk from home
- Advocating for improved metropolitan and regional public transport, with a focus on improved connectivity, accessibility and the electrification of existing fleets
- Sustainable road and path construction by substituting different materials and adjusting path and road designs
- Leverage their extensive experience in upgrading public lighting infrastructure to roll-out LEDs and smart lighting technologies

4. Commit to targets of all new cars and heavy vehicles sold being zero emissions

Targets should be aligned to the latest climate science and seek to limit global warming to 1.5 °C. This should be supported by the establishment of interim targets for each category of vehicle to provide certainty and a smooth transition for the vehicle market, businesses, and households.

Twenty-seven countries, including the United States, Canada, New Zealand, Ireland, Norway and Ukraine, have committed to achieving 100% zero-emission new truck and bus sales, through the Memorandum of Understanding (MOU) on Zero-Emission Medium and Heavy-Duty Vehicles.³ Adopting similar targets in Australia will drive changes in the heavy vehicle market, making availability easier for Australia if such a target is introduced. Emissions from heavy trucks have more than doubled from 1990 to 2016 and are expected to grow faster than any other transport emissions in Australia.⁴

Many councils are struggling to transition their heavy vehicle fleets, mainly due to availability of vehicles and high costs. Introducing ambitious targets for heavy vehicles, alongside investment in research and development of hydrogen and zero emission biofuels, will be necessary for Australia to deliver legislated emission reduction targets and provide long-term certainty for the market.

5. Accelerate the electrification of the rail network

The consultation paper acknowledges the importance of decarbonising the rail sector, especially away from diesel. We support technology improvements and pilot projects, government investment and investigation of regulatory requirements for a zero-emission rail network.

6. Support for Ultra-Low Emissions Zones (ULEZ) and Low Emissions Zones (LEZ) in designated urban areas

The consultation paper acknowledges the importance of working with the states and territories to deliver coordinated policies that reduce emissions, including policies and actions primarily of state responsibility. Accordingly, we note our support for the introduction of ULEZ and LEZ in designated areas. In particular, we point out the potential for a ULEZ and specifically an Urban Freight Consolidation Centre (UFCC) to address increased freight and container transport to, from and through the inner west of Melbourne due to the Port of Melbourne expansion. Modelling shows that a UFCC that reduced 50 truck trips per day could lead to carbon savings of more than 27,000 kilograms per kilometre and cost savings of \$3,650 per annum per kilometre (Victorian Government, 2023, 'Urban Freight Consolidation Centre Opportunities Paper').

³ <https://globaldrivetozero.org/mou-nations/>

⁴ Climate Analytics 2019 <https://climateanalytics.org/media/australiacclimatefactsheets2019-transportsector-climateanalytics.pdf>

We would welcome the opportunity to speak with you directly regarding this submission and how we can leverage the respective capabilities and resources of all levels of government to ensure the best outcomes for Victorian communities.

Greenhouse Alliances and contacts

- Barwon South-West Climate Alliance (BSWCA), Sue Phillips, Executive Officer, sue.phillips@bswca.org
 - City of Greater Geelong
 - Golden Plains Shire
 - Surf Coast Shire
 - Borough of Queenscliffe
 - Colac Otway Shire
 - Warrnambool City Council

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 - Central Goldfields Shire Council
 - Gannawarra Shire Council
 - Greater Bendigo City Council
 - Hepburn Shire Council
 - Loddon Shire Council
 - Macedon Ranges Shire Council
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 - Alpine Shire Council



- o Benalla Rural City Council
 - o Campaspe Shire Council
 - o Greater Shepparton City Council
 - o Indigo Shire Council
 - o Mansfield Shire Council
 - o Mitchell Shire Council
 - o Moira Shire Council
 - o Murrindindi Shire Council
 - o Towong Shire Council
 - o Strathbogrie Shire Council
 - o Wangaratta Rural City Council
 - o Wodonga City Council
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 - o Manningham City Council
 - o City of Melbourne
 - o Merri-bek City Council
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 - o City of Yarra
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 - o Cardinia Shire Council
 - o City of Casey
 - o Greater Dandenong City Council
 - o Mornington Peninsula Shire Council
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 - o Hobsons Bay City Council
 - o Melton City Council
 - o Moonee Valley City Council
 - o Moorabool Shire Council
 - o Wyndham City Council

This letter has been approved through the Greenhouse Alliances governance structures but may not have been formally considered by individual members. The submission does not necessarily represent the views of all members.