



An Australian Government Initiative



RDA Illawarra

30 October 2023

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Dear Greg

Submission - Net Zero Wollongong Climate Change Mitigation Plan

Regional Development Australia (RDA) – Illawarra thanks Wollongong City Council for the opportunity to comment on the draft Net Zero Wollongong Climate Change Mitigation Plan 2023-30 (CCMP); our submission is attached with this letter.

Wollongong City Council is to be commended for the initiatives included in the CCMP, and for the actions taken in recent years to reduce emissions from its own operations.

RDA Illawarra fully supports the draft CCMP however feels improvements could be made regarding:

1. Priority of several initiatives
2. Engagement of organisations in control of industrial emissions
3. Goal setting
4. Review and Communication.

RDA Illawarra believes that the observations and suggestions made in our submission will enhance the plan, its implementation and community engagement.

We look forward to the continuation of action to reduce community emissions in Wollongong, and achievement of Net Zero 2050.

Yours sincerely

Debra Murphy
CEO, RDA Illawarra



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RDA Illawarra
Submission to Wollongong City Council
Net Zero Wollongong Climate Change
Mitigation Plan 2023-30

30 October 2023

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Background

In response to the emerging climate crisis, Wollongong City Council (WCC) has developed a Climate Change Mitigation Plan 2023-2030 (CCMP) that provides a 'whole of community' approach to reducing emissions in the Wollongong Local Government Area.

The CCMP is based around the three pillars of:

- ▶ Communities in Action
- ▶ Empowering Communities; and,
- ▶ Leading by Example.

Absent any urgent, continuing and consistent action, emissions will not be reduced, and a Net Zero target will not be achieved by 2050.

The **overall emissions profile for the Wollongong LGA** is dominated by industrial processes (71%), followed by the use of electricity (19%), transport (5%) and gas (4%), and the remainder from waste.

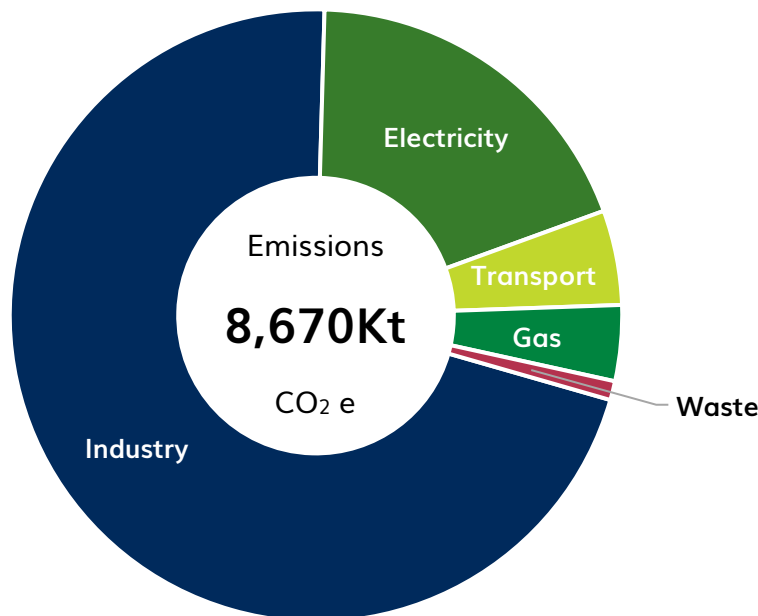


Figure 1: City of Wollongong community emissions 2019/20 showing industrial processes as the largest contributor. Waste is a minor overall contributor but is a major component of Council-controllable emissions.

The council focus excludes emissions from industrial processes – over which it has minimal control - and the plan summarises actions that Council can implement. These will reduce the impact of its own operations and influence the local community to further reduce emissions within Wollongong, resulting in achievement of the Net Zero target by 2050.

In terms of **emissions under the direct control of WCC**, waste in landfill is the largest contributor with domestic waste producing fifty-six percent (56%) of emissions, and commercial thirty percent (30%). A further ten percent contribution is made by consuming electricity from fossil fuel sources, followed by the use of diesel.

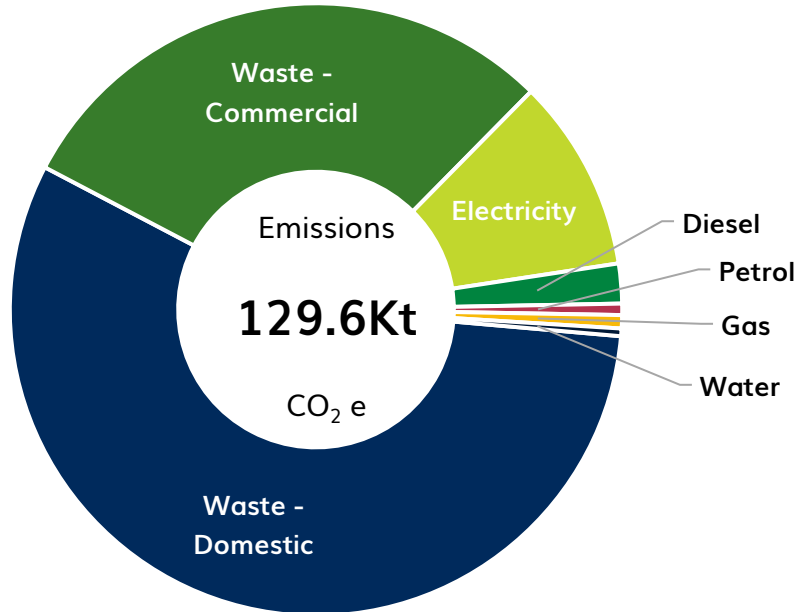


Figure 2: Emissions from Wollongong City Council Operations are dominated by waste, which are mitigated by gas capture/flaring and FOGO activities.

The plan describes broad actions under three categories:

1. Communities in Action
2. Empowering Communities; and,
3. Leading by Example

that are intended to reduce emissions in the Wollongong LGA. The plan also outlines the support that will be extended to engage the local community in pursuit of Net Zero emissions.

The CCMP has been developed following evaluation of the previous plan, community engagement along with examination of technical feasibility and impact of the proposed actions.

Wollongong City Council has requested public comment and submissions on the CCMP, and this document summarises the observations and suggestions of Regional Development Australia (RDA) – Illawarra.

Observations

Wollongong City Council are to be commended for their leadership in emissions reduction and the effort and resources applied to the creation of the Climate Change Mitigation Plan 2023-2030. It delivers a summary of the activities that Council will undertake to mitigate the impact that emissions are having on climate change. RDA Illawarra is supportive of the Plan and its initiatives, and makes the following observations on Council’s CCMP:

A. Communications & Promotion

During the past few years, WCC has implemented several initiatives that are already reducing emissions, including the successful Food Organics and Garden Organics (FOGO) recycling program, gas capture / flaring and use of solar photovoltaics in council operations. This leadership needs to be widely communicated and promoted withing the community and local businesses to generate further support for regional emissions reduction.

A comprehensive, enduring communications plan is needed to preserve this issue in the public consciousness.

B. Focus

The CCMP aims to reduce emissions from operations that are under the control of WCC and influence the behaviour of residential and commercial operations through education, policy settings, guidelines and – potentially – regulation. A cursory review by RDA Illawarra indicates that this will have a direct impact on one per cent of the City of Wollongong’s community emissions, and influence (but no direct control) over a further twenty-two per cent.

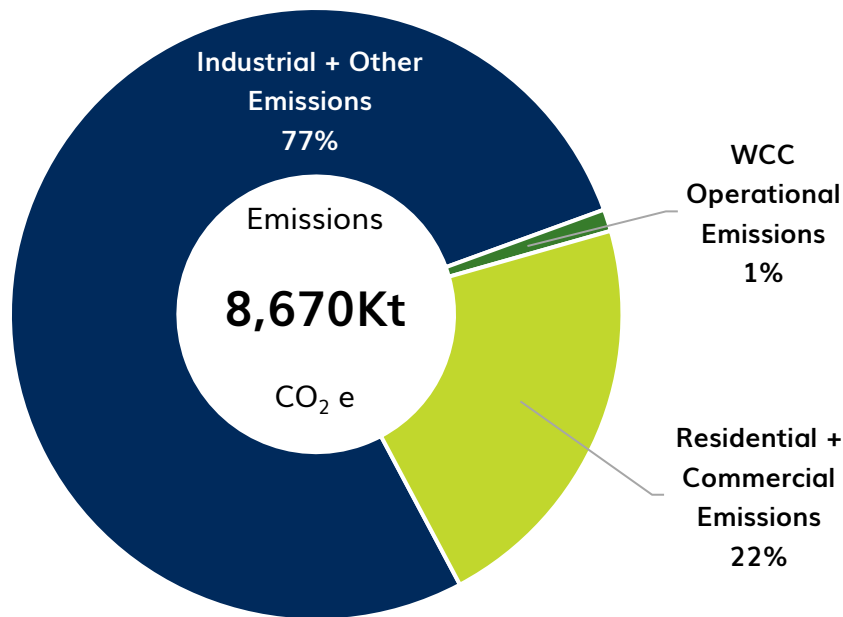


Figure 3: Scope of the CCMP excludes 77% of City of Wollongong’s community emissions.

RDA Illawarra feels that exclusion of industrial process emissions is a lost opportunity and that the programs and initiatives proposed in the CCMP could be extended to influence and engage the “four of Australia’s top emitters” in our LGA. They can partner in WCC’s leadership towards reduced emissions.

C. Priority Areas

The CCMP states that eighty-six per cent of WCC’s operational emissions are from waste. However, there are only two waste-related initiatives in ‘Empowering Communities’ (items 12 & 13) and both have only a ‘Medium’ priority and the impact on one is “Not estimated”. Further support to reduce emissions from waste is described in ‘Leading by example’ (p41) and suggestions to engage the community are described on page 28.

According to the CCMP data, Wollongong’s 14,100 commercial operations (businesses) produce 29% of the waste emissions, whilst 89,500 dwellings – over six times the number - produce less than twice that volume at 57%.

Given the large volume of emissions from waste – and the higher relative proportion from commercial waste - RDA Illawarra feels that:

- A. A higher priority should be allocated to waste-related initiatives; and,
- B. There should be an increased focus on reducing or recycling waste from commercial operations.

Similarly, education and regulatory efforts regarding sustainable building guidelines have been given a low priority. RDA Illawarra feels this is an area that should have more focus.

RDA Illawarra fully supports the goal of the CCMP to increase public and active transport usage. Recent research commissioned by RDA Illawarra and delivered by SMART Infrastructure Facility at UOW reinforces the need for improved transport planning in the region. An integrated, intermodal transport services plan is required, along with the funding required for implementation. RDA Illawarra is willing to share the research findings and model to assist with further advocacy.

D. Specific Actions

RDA Illawarra supports the initiatives and actions outlined in the CCMP however feels that the actions could be better defined to be more Specific, Measurable, Achievable, Relevant, and Time-based (SMART). For example, whilst most of the Empowering Actions contain a ‘Potential Maximum Impact’ there is no specific target to be achieved by the activity; and none contain a time for implementation or completion, nor any milestone objectives – other than the overall timeframe of the CCMP (2023-30).

RDA Illawarra feels that specific targets would enhance the CCMP and provide a realistic basis for regular review (see below) as well as public transparency.

E. Review

RDA Illawarra believes that progress in emission reduction should be regularly reviewed, and successes should be widely promoted and celebrated to further engage the residential, commercial and industrial communities.

RDA Illawarra feels there should be:

- ▶ Quarterly updates on the Council website against SMART goals and objectives (a simple 'traffic light' report could suffice)
- ▶ An annual Council and community review of overall CCMP effectiveness, with outcomes posted on the Council website.

Suggestions

Finally, RDA Illawarra makes the following suggestions to enhance the CCMP:

1. Whilst reducing the use of gas is included in the CCMP, RDA Illawarra suggests that use of gas in new residential developments be strongly discouraged or proscribed. This would encourage the use of electricity for cooking and heating.
2. Similarly the use of heat pumps for hot water in all new developments should be obligatory
3. Provide free business energy audits and co-fund (50:50) cost of implementing recommended changes
4. Consider installing solar panel arrays on open-ground car parks (and on the top floor of multi-storey car parks) to provide covered car parking beneath. A premium could be charged for 'covered' parking and the power generated will provide lighting for the facility as well as the local grid.
5. Promote and celebrate the use of vertical and rooftop gardens to improve vegetation cover in urban areas
6. Specify hydrogen-fuelled vehicle in all future waste collection contracts. Work with TfNSW and bus operators to do the same for public transport.

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