



Australian
National
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Submission: ACT Climate Change Strategy 2026- 2035

ANU Institute for Climate, Energy & Disaster
Solutions

This submission is the collated perspective of researchers that work at The Australian National University. The views and opinions expressed in this submission reflect those of the authors and contributors.

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18 March 2026

City and Environment Directorate
GPO Box 158
Canberra
ACT2601

Re: ACT Climate Change Strategy 2026-2035

Dear Suzanne Orr,

Please find enclosed a submission by the ANU Institute for Climate, Energy and Disaster Solutions (ICEDS) for the ACT Climate Change Strategy 2026-2035.

Based at The Australian National University, ICEDS connects industry, governments and communities with climate, energy and disaster-risk expertise at the Australian National University. Our goal is to advance innovative solutions to address climate change, energy system transitions and disasters. We facilitate integrated research, teaching and policy engagement across disciplines.

The enclosed submission contains contributions from experts in climate science, agrifood systems, the gender-climate nexus, disaster recovery and housing stock, and climate change education.

Regarding climate change education, ANU ICEDS has successfully piloted a Climate Essentials for Educators program, and is seeking to collaboratively develop and extend this program to encompass a whole school faculty.

Our network of ANU researchers will gladly offer further consultation.

Sincerely,

Professor Llewelyn Hughes

Institute for Climate, Energy and Disaster Solutions

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Executive Summary

The Australian National University (ANU) Institute for Climate, Energy and Disaster Solutions (ICEDS) welcomes the opportunity to provide input to the ACT Climate Change Strategy 2026-2035.

The submission recommends:

- *Articulate clear commitments to allow for consistent interpretation, implementation and evaluation.*
- *Prioritise adaptation action to reduce climate risk and deliver co-benefits to the community over resilience framing.*
- *Include plans to mainstream the climate change strategy across the ACT government using regulatory, institutional, and capacity and capability pathways.*
- *Embed climate capability and responsibility centrally by establishing an entity within the Chief Minister, Treasury and Economic Development Directorate.*
- *Address gender-specific climate vulnerabilities and opportunities.*
- *Establish clear mechanisms for meaningful youth and future-generation representation in climate decision-making, informed by international best practices.*
- *Embed comprehensive climate change education in ACT schools through supported teacher professional development and partnerships with tertiary institutions.*
- *Embed climate adaptive design standards into all new housing developments and post-disaster construction.*
- *Strengthen the ACT's leadership role in integrated disaster governance and recovery.*
- *Adopt a systems approach to land use, agriculture, food and community.*
- *Adjust emissions accounting approaches to reflect the ACT's agricultural consumption.*

Introduction

This submission responds to the discussion paper “Developing the Next ACT Climate Change Strategy”. It identifies several areas where the framing and design of the strategy could be strengthened to support more effective implementation.

In particular, the submission examines the clarity of policy language and framing used in the strategy, governance and coordination mechanisms needed to mainstream climate considerations across government, the integration of wellbeing, equity and justice considerations, the role of housing and disaster recovery in adapting to climate change, and the attention given to agrifood systems.

Together, these issues highlight the importance of designing the strategy as a practical framework capable of guiding coordinated action across government and the community.

1. Framing and language

The intention of the ACT Climate Change Strategy for 2026-35 is to set a clear direction for reducing emissions, preparing for climate impacts, and supporting a fair and inclusive transition to a net zero, climate-resilient city by 2045.

How the strategy frames climate issues will inform the way the ACT considers and develops its action plans and next steps.

1.1 Noncommittal Language

It is entirely appropriate for the discussion paper to contain language that does not represent a policy decision. As the ACT Climate Change Strategy for 2026-35 is cemented, clear and intentional statements will drive appropriate resourcing and implementation.

Examples of non-committal language include:

- *“The ACT Government will explore opportunities to reduce emissions in key sectors.”* Where “explore opportunities” indicates no firm commitment.
- *“The strategy aims to support households to reduce emissions.”* Where “aims to support” indicates no specific action.

Clear policy language allows for consistent interpretation among implementing actors, and removes ambiguity for evaluation purposes.¹² In the ACT, the strategy is one of many guiding documents and will be implemented across directorates and other stakeholders. While ambiguous language may lend flexibility, it will also add complexity to its interpretation and implementation and raise questions about the ACT’s climate ambition.

1.2 Adaptation and Resilience

The discussion paper preferences resilience language over adaptation action. Climate risk is well understood to be complex, with dynamic interactions taking place among climate-related hazards, human, and ecological systems. However, an adaptation-centred approach allows the ACT government to support its community through a changing climate without shifting responsibility to individuals.

¹ Matland, “Synthesizing the Implementation Literature: The Ambiguity-Conflict Model of Policy Implementation.”

² Hupe, “The Thesis of Incongruent Implementation: Revisiting Pressman and Wildavsky.”

Precise use of language when discussing climate risk management will reduce ambiguity. Climate risk is composed of hazards, vulnerabilities and exposure.³ Targeting these components through adaptation actions allows the ACT government to moderate harm or exploit potential opportunities.⁴ Advocating for adaptation measures that serve a dual function of reducing climate risk and delivering co-benefits to the community is a proactive framing, whereas resilience refers to the capacity of a system to cope with a hazardous event⁵ and is reactive.

Prioritising adaptation action shifts the burden from the ACT community to be resilient (to cope, respond and reorganise after withstanding an event) back to the ACT government to engage proactively in risk reduction activities. Even after adaptation action has been taken, some risk will remain. Once an adaptation agenda has been designed, and a level of accepted residual risk established, then the ACT government can lean on community resilience.

Recommendations:

Articulate clear commitments to allow for consistent interpretation, implementation and evaluation.

Prioritise adaptation action to reduce climate risk and deliver co-benefits to the community over resilience framing.

2. Governance and Coordination

The language and framing in the strategy are only effective if there are governance arrangements in place to support its implementation.

The emissions targets laid out in the ACT Climate Change Strategy 2019-25 were not met.⁶ When making commitments in the 2026-35 strategy, attention must be given to its implementation. Climate change is a complex policy problem, which requires coordination across all actors. The embedding of climate change across government policy, decision-making and operations is sometimes referred to as mainstreaming.

Researchers have categorised mainstreaming pathways as follows:

1. Regulatory Pathways: Formal rules and obligations to integrate climate change.
2. Institutional Pathways: Governance arrangements that facilitate integration of climate change.
3. Capacity and Capability Pathways: Resources to build climate change integration skills in decision-makers across government.⁷

Embedding the commitments made in the new strategy across the ACT may benefit from considering a combination of these pathways. Where the strategy comprises one regulatory pathway, legislative instruments can explicitly require consideration of climate change across all ACT government decision-making and operations. Available examples include the *Victorian Climate Change Act 2017*.⁸

In the ACT, the Chief Minister, Treasury and Economic Development Directorate has a remit to advise on policy, economic and financial matters, service delivery, communications and intergovernmental relations. Including a dedicated entity responsible for climate risk assessments, emissions accounting, monitoring and reporting, and coordination across

³ Ara-Begum et al., *Point of Departure and Key Concepts. Dins: Climate Change 2022: Impacts, Adaptation and Vulnerability. Contribution of Working Group II to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change (IPCC)*.

⁴ Lee et al., *Climate Change 2023: Synthesis Report. Contribution of Working Groups I, II and III to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change*.

⁵ Ara-Begum et al., *Point of Departure and Key Concepts. Dins: Climate Change 2022: Impacts, Adaptation and Vulnerability*.

Contribution of Working Group II to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change (IPCC).

⁶ ACT Government, "Developing a New Climate Change Strategy for the ACT."

⁷ Foerster and Bleby, *Climate Mainstreaming in Practice: Using Law to Embed Climate Change in Government Policy and Decision-Making*.

⁸ Foerster and Bleby, "When Climate Mainstreaming Is the Law: A Case Study of the Climate Change Act 2017 (Vic)."

government within this central agency is an institutional pathway to mainstreaming. Other Australian jurisdictions have used similar approaches. For example, in 2022, the NSW Government established the Office of Energy and Climate Change in the NSW Treasury (which was transferred to the Department of Climate Change, the Energy and Water in 2025.)⁹ In its tenure as part of the central agency, the Office of Energy and Climate Change had reach into whole-of-government processes, including budget development.

Recommendations:

Include plans to mainstream the climate change strategy across the ACT government using regulatory, institutional, and capacity and capability pathways.

Embed climate capability and responsibility centrally by establishing an entity within the Chief Minister, Treasury and Economic Development Directorate.

3. Wellbeing, Equity and Justice in a Changing Climate

The ACT government emphasis on wellbeing and equity in the discussion paper is welcome. The wellbeing of the current and future ACT community will depend greatly on its response to the changing climate. With acknowledgement that wellbeing and equity are heavily moderated by social vulnerability associated with marginalised identities, this submission will comment on two identities for further consideration in the ACT Climate Change Strategy 2026-35: gender identity and young people and future generations.

3.1 Wellbeing Reporting in the ACT

The ACT has a track record of measuring wellbeing indicators relating to climate change through its ACT Wellbeing Framework.¹⁰ It was last updated in November 2023 (at the time of writing, the dataset is overdue for its two-yearly update).¹¹ In parallel, the ACT government has released wellbeing-related statements as a part of the budget process every financial year since 2021-22. However, climate change has never been an identified priority area in the wellbeing budget statement.¹² The most recent iteration, 2025-26, only made passing mention of climate change, despite the cross-cutting nature of climate change impacts. For the priority areas identified (cost of living, housing, addressing marginalisation and disadvantage, mental and physical health, women, and children's early years) climate change will exacerbate existing inequalities without due consideration.

3.2 Gender-responsive climate policy

The impacts of climate change are inherently gendered, with women and girls experiencing amplified inequalities in the wake of climate change.¹³ Additionally, marginalized gender identities, including nonbinary, transgender and queer populations are more susceptible and have fewer resources to recover from climate disasters and other adverse climate change impacts.¹⁴

The 2019-25 iteration of the ACT climate change strategy does not mention the gendered nature of climate change. In its wellbeing indicators, the ACT presents some data in a gender-disaggregated format. Collection of gender-disaggregated data through existing monitoring,

⁹ NSW Government, "NSW Legislation: Transfers to Department of Climate Change, Energy, the Environment and Water."

¹⁰ ACT Government, "ACT Wellbeing Data Dashboard."

¹¹ ACT Government, "ACT Wellbeing Framework: Domains and Indicators."

¹² ACT Government, "Treasury: Previous ACT Budgets."

¹³ UN Women, *How Gender Inequality and Climate Change Are Interconnected*.

¹⁴ Mann et al., "Climate Change-Related Disasters & the Health of LGBTQ+ Populations."

evaluation and learning can support the ACT government to understand gender-differentiated impacts of climate change and to ensure equitable distribution of benefits from just transition activities. Evidence shows that limited use of gendered data points in policy can lead to the perpetuation of inequalities.¹⁵

Championing equity in climate strategy requires an understanding of the cross-cutting nature of gender identity and climate impacts. In some cases, the gendered impacts of climate change are clear. For example, women face a heightened risk of mortality during extreme heat.¹⁶ As such, adaptation interventions for extreme heat should include attention to the heat-stress vulnerabilities of women. In some cases, the gendered outcomes of climate change are more abstracted. Two examples can illustrate this:

- Gender-based violence spikes significantly during extreme heat events and disasters.¹⁷ Interventions here require coordination, including appropriately trained and resourced first-responders, and broader cultural interventions to address underlying issues that will be exacerbated by climate change.
- The energy transition will require a workforce with science, technology, engineering and mathematics (STEM) qualifications. Women graduate from STEM qualifications at a significantly lower rate than men enrolled in the same courses. Those that do graduate are less likely to pursue a STEM career, and those that do have a STEM career, are more likely to leave it.¹⁸ To promote a just transition, interventions that improve the enrolment and retention of women and girls in STEM education and the workforce will support better gender-distribution of climate opportunities.

3.3 Intergenerational equity

The Universal Declaration of Human Rights (UDHR) Article 1 states that "all human beings are born free and equal in dignity and rights ... and should act towards one another in a spirit of brotherhood."¹⁹ When a person is born does not impact their human right to a clean, healthy and sustainable environment.²⁰ This forms a moral obligation for the present generation to consider future generations when making decisions that could impact this right. The action or inaction of current decision-makers sends a strong signal to young people whether their long-term interests are considered or championed.

As acknowledged in the discussion paper, young people report significant mental health impacts from climate change. Approaches that promote hope, agency and empowerment rather than fear, through education, climate literacy and representation are critical responses.

At the federal level, Australia is improving its representation of young people in democratic and political institutions, with the Office for Youth sitting within the Department for Education, running five youth advisory groups.²¹ However, this model has drawbacks. As mentioned in the Governance and Coordination section, central agencies have a better reach into whole-of-government processes, with line agencies such as Education at risk of being siloed. Instead, the ACT Climate Change Strategy 2026-35 should look to international exemplars of youth representation.

Wales is generally considered to be a leader in intergenerational decision making with legislation establishing an Independent Future Generations Commissioner tasked to be a "voice for the not-yet-born" to help public bodies consider the long-term effects of their decisions. However, Welsh scholars have critiqued the approach with lessons-learned including:

¹⁵ UNU IIGH, *Limited Gender Data Deepens Inequalities*.

¹⁶ Ballester et al., "Heat-Related Mortality in Europe during the Summer of 2022."

¹⁷ Quinones, *Climate Crisis Driving Surge in Gender-Based Violence, UN Study Finds*.

¹⁸ Ortiz-Martínez et al., "Analysis of the Retention of Women in Higher Education STEM Programs."

¹⁹ United Nations General Assembly, "The Universal Declaration of Human Rights (UDHR)."

²⁰ United Nations General Assembly, "The Human Right to a Clean, Healthy and Sustainable Environment: Resolution Adopted by the Human Rights Council on 8 October 2021."

²¹ Australian Government, "Office for Youth."

- Legislation wording is too vague and aspirational to be translated into practical actions.
- Stakeholder engagement processes left people behind, particularly at the local level.
- Support and guidance to implement the legislation has to be tailored to its contexts, balancing local autonomy and central oversight.
- Trust in institutions is necessary for implementation. Established and constructive stakeholder relationships allow the spirit of the legislation to come to life.
- Collaboration across actors and sectors has to be simplified by breaking down barriers like rigid systems and ways of working.
- For the legislation to work, cultural change needs to accompany it.²²

3.4 Climate Capability and Education

Representation in decision-making contexts will be more useful if young people are educated to better understand the nature of climate change and what it means for them.

The discussion paper includes a priority to invest in innovation, education and partnerships to build local climate capacity.

While Australia has committed to strengthening climate change education through the Paris Agreement (Article 12), its education systems have not yet effectively deployed climate education in schools.^{23,24} The Australian curriculum provides limited guidance on climate change, with teachers relied upon to voluntarily integrate the topic under the cross-curriculum priority of sustainability. Climate change education is deprioritised unless teachers initiate it themselves.

Establishing research partnerships between ACT-based universities and schools to inform development of effective climate change education sequences for school students and professional development programs for educators would address the gaps that exist at the federal level. The ACT is well-placed to become a leader in this space, with several initiatives already underway, including the Environment Directorate's Sustainable Schools Team that assists schools to undertake environmental projects; the Future Skills Academy in the Education Directorate that runs STEM programs for students on real-world challenges; and key events such as the annual Student Climate Action Conference. In fact, this last event has been used as a model to create the Australian Museum's Student Climate Leadership Forum in Sydney, a clear demonstration of the impact the ACT can have in the climate change education space nationally.²⁵

These initiatives are not core business for schools. They are typically driven by dedicated individual teachers at specific schools. Such opportunities need to be supported in every school to ensure equity. Embedding climate change education into the core business of schools would necessitate delivery of professional development programs for teachers. Climate change is a complex topic, and there is a need to support educators to acquire the knowledge and skills to navigate this topic in the classroom, across different subjects and year levels, in ways that build hope and agency. Educators are generally not trained in climate change in their undergraduate degrees, and have few opportunities to build these capabilities while in the job. The ACT has an opportunity to enable educational partnerships between tertiary institutions and schools to design and deliver professional development.

Young Australians feel disempowered by the current state of climate change education.²⁶ There is a strategic opportunity for the ACT government to embed comprehensive climate change

²² The Conversation, *A Decade on, Six Things the World Can Learn from Wales' Innovative Future Generations Law.*

²³ Beasy et al., "The Burden of Bad News: Educators' Experiences of Navigating Climate Change Education."

²⁴ Academy of the Social Sciences in Australia, "Climate Change Education: A Summary of Research Reviews, Assessments Instruments, and Ways Forward."

²⁵ Australian Museum, "Student Climate Leadership Forum."
²⁶ Russell, "A 'Greenhouse Affect'? Exploring Young Australians' Emotional Responses to Climate Change."

education in its schools to support youth wellbeing and agency, and build long-term community climate capability and capacity.

Recommendations:

Address gender-specific climate vulnerabilities and opportunities.

Establish clear mechanisms for meaningful youth and future-generation representation in climate decision-making, informed by international best practices.

Embed comprehensive climate change education in ACT schools through supported teacher professional development and partnerships with tertiary institutions.

4. Housing, Disaster Risk and Building Back Better

Housing plays a critical role in climate adaptation. Climate change does not affect households evenly and can exacerbate existing inequalities. Housing development should therefore be designed with explicit consideration of adapting to climate hazards in the long-term. This is particularly important given that approximately 30,000 new homes are planned in the ACT by 2030, including 26,000 through government land release programs.²⁷

Post-disaster recovery aims to build back better by incorporating stronger adaptation measures. However, insurance systems typically fund rebuilding on a like-for-like basis, limiting opportunities to adapt to the changing climate. Following the 2003 Canberra bushfires, redevelopment in areas such as Duffy prioritised rapid rebuilding to quickly regain stability, rather than embedding standards that require adaptation to the increased frequency and severity of bushfires.²⁸

Disaster governance in Australia is often fragmented across Commonwealth, state and local governments. The ACT governance structure combines state and local functions within the Australian Capital Territory Legislative Assembly, creating an opportunity for more integrated disaster planning and recovery. The Legislative Assembly could therefore strengthen its leadership role in disaster recovery and adaptive measures.

Recommendations:

Embed climate adaptive design standards into all new housing developments and post-disaster construction.

Strengthen the ACT's leadership role in integrated disaster governance and recovery.

5. Agrifood Systems

Food systems both contribute to climate change and are highly vulnerable to climate impacts and natural disasters.²⁹ Despite this, the discussion paper contains minimal reference to food systems, referring primarily to agriculture and food waste while overlooking the broader food supply chain. Expanding the attention to take on a systems approach to land use, agriculture, food and community is necessary for developing a climate change strategy that is fit for purpose.

²⁷ ACT Government, *ACT Budget 25-26: 30,000 New Homes to Provide More Housing for Canberrans*.

²⁸ Heffernan et al., *Enhancing Housing Recovery Policy and Practice for Improving Community Resilience to Future Disasters*.
²⁹ Mbow et al., "Climate Change and Land."

Strengthening local food production and supply infrastructure can support adaptation to increased disruptions such as bushfires and pandemics. Measures such as protecting agricultural land, supporting local food hubs and applying food-sensitive urban design principles could support a more climate adaptive food system.

Reducing food waste should address both households and the commercial sector, including retail and hospitality. At the commercial level, incentives and structures need to be in place for diversion of edible food from landfills. The ACT government can include food retail and hospitality in the FOGO.

Decentralised composting initiatives can complement the ACT's FOGO rollout while improving soil health and supporting urban food production.³⁰ At the hyper-local level, community composting programs can familiarise local communities with the concept while building neighbourhood relationships (which can enhance disaster preparedness)³¹, and improving urban soils with an aim to either enhance local food production or other plantings that deliver other co-benefits.

The current reporting attributes approximately 2% of ACT emissions to agriculture, which likely reflects primarily Scope 1 emissions occurring within the Territory. However, a significant proportion of emissions associated with food consumption occur in Scope 2 and Scope 3 supply chains, including agricultural inputs, processing, transport and distribution outside the ACT. In the ACT emissions inventory, the methodology for the energy sector was adjusted to incorporate Scope 2 emissions to better reflect the emissions associated with electricity consumption in the Territory³². A similar methodological approach could be considered for agriculture and food systems. This would provide a more accurate representation of the climate impacts associated with the ACT's food system.

Recommendations:

Adopt a systems approach to land use, agriculture, food and community.

Adjust emissions accounting approaches to reflect the ACT's agricultural consumption.

Conclusion

The ACT Climate Change Strategy 2026-35 represents an opportunity to strengthen the Territory's climate policy framework. Achieving the ACT's long-term emissions reduction and adaptation objectives will depend not only on the targets set within the strategy, but on the governance arrangements, policy integration and institutional capacity that support their implementation.

Several areas within the discussion paper could be strengthened to support this objective. Clear and consistent policy language will reduce ambiguity and support effective implementation across government and partner organisations. Embedding climate considerations through regulatory, institutional and capability pathways can help mainstream climate action across decision-making processes. Strengthening the integration of wellbeing, equity and justice considerations will ensure that climate policy recognises the uneven distribution of climate risks and transition opportunities across the community.

The strategy also provides an opportunity to address policy areas that are currently underemphasised. Housing and disaster recovery planning will play an increasingly important

³⁰ Donovan et al., "Food-Sensitive Planning and Urban Design: A Conceptual Framework for Achieving a Sustainable and Healthy Food System."

³¹ Losee et al., "Social Network Connections and Increased Preparation Intentions for a Disaster."

³² Strategy.Policy.Research., "ACT Greenhouse Gas Inventory: 2024-25."

role in building community capacity as climate hazards intensify. Similarly, greater attention to agrifood systems would improve understanding of the ACT's broader climate impacts and support the development of lower emission and climate-adapted local food systems.

Taken together, these considerations highlight the importance of designing the ACT Climate Change Strategy 2026-35 as a whole-of-government framework that supports coordinated, equitable and forward-looking climate action.

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