



City of Darwin Council
GPO Box 84
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Introduction

The Environment Centre NT (**ECNT**) is the peak community sector environment organisation in the Northern Territory of Australia, raising awareness amongst community, government, business and industry about environmental issues and assisting people to reduce their environmental impact and supporting community members to participate in decision-making processes and action.

ECNT thanks the City of Darwin for the opportunity to comment on the Climate Emergency Strategy 2020 – 2030 Draft. It is commendable that the City of Darwin have had the initiative to declare a Climate Emergency, recognising that a strategic path towards a zero-carbon emissions Council and community is imperative if we are to prepare for increased climate change impacts and mitigate and adapt for inevitable risks.

The Draft Strategy has gone beyond the scope and jurisdiction of the Council, acknowledging it is a holistic and interconnected framework designed to be achieved in collaboration with stakeholders including the NT Government, among others, as elements included fall outside of the Council's jurisdiction in decision making. We commend City of Darwin's willingness to take on a leadership role in addressing the causes and impacts of climate change in Darwin. However, as described in greater detail below, we argue for an expanded scope of this leadership role (emphasising adaptation and climate justice) and for more ambition on the areas over which the City of Darwin has control. In particular, we recommend that the Council also commit to using a framework which incorporates climate justice principles in both internal and community operations and decisions.

The Council's three-pronged approach

ECNT commend the Council in committing to advocacy outside of their limitations, for example in regards to energy efficiency minimum standards, and

1. Enhanced and aligned decision-making

As both the Discussion Paper and the Draft Strategy acknowledge, a Climate Emergency response requires action both to mitigate the causes of climate change through reducing emissions to net-zero and to adapt to the impacts of climate change. However, the Council's response seems to put a greater emphasis, or at least more detailed responses, on reducing emissions, rather than climate adaptation. For instance, in the "Enhanced and Aligned Decision-making" prong of the Council's Approach to the Climate Emergency, there is no specific mention of decision-making about adaptation but there are two sections are focused on making decisions to reduce emissions:

1.1 Decisions are to be aligned to the carbon management hierarchy, and

1.3 Mainstreamed net-zero decision-making to future-proof our response.

We agree that mainstreaming net-zero emissions in decision-making and making decisions aligned with the carbon management hierarchy are essential. However, we recommend a similar focus on climate adaptation in decision-making. Additionally, we recommend that a climate justice lens should be applied in all decision-making, in order to address the disproportionate impacts of climate change (and potentially of climate mitigation actions) on vulnerable groups. To address both issues, we specifically recommend that the Council:

Mainstream consideration of climate justice in decision-making through adopting a capabilities approach.

As Schlosberg, Collins and Niemeyer explain in their 2017 article “Adaptation policy and community discourse: risk, vulnerability, and just transformation”:

Broadly, a capabilities approach to justice looks not simply at distributional or procedural inequity, but at the provision of a range of basic needs and processes necessary for citizens to construct a functioning life... a capabilities approach can be used to frame a form of adaptation policy with justice at its core. Central to this argument is the use of a capabilities frame to understand the basic needs, rights, and political processes to be engaged and protected as we adapt to the most important environmental challenge we face. Such an approach incorporates justice concerns for fair distributions, political and social recognition, and procedural inclusion as part of a set of necessary capabilities.

Adopting a capabilities approach to climate justice would also assist in making decisions where there are trade-offs. The Draft Strategy is currently silent on how trade-offs will be made (as discussed in 1.4 of the Council’s Approach – Navigating and minimising trade-offs).

3. Comprehensive engagement

As outlined in the quote above, a capabilities approach encompasses elements of both distributive justice (“fair distributions”) and procedural justice (“political and social recognition, and procedural inclusion”). Comprehensive engagement, particularly with vulnerable groups, another prong in Council’s approach to the Climate Emergency, is therefore essential to implementing a capabilities approach. To ensure that engagement is comprehensive, ECNT recommends Council look towards the wide range of community organisations and service providers in Darwin to develop deeper connections with the people of Darwin, and in particular the disadvantaged members of our community who will be impacted first and hardest by climate change. Working collaboratively with these organisations will provide Council with the opportunity to create meaningful people-centered responses, enhancing the adaptive capacity of both these already under-resourced organisations and City of Darwin.

In addition to regular engagement with the wider public, we recommend that the Council consider forming a Climate Advisory Committee. City of Darwin currently have various community advisory groups, including members of the public who are able to provide additional strategic direction and include a voice from the community through active community engagement. ECNT recommends that the Council form, resource and embed a Climate Advisory Committee into decision making processes. Such a group would

include representation from community experts in the field, including local indigenous groups, multicultural organisations, community service providing organisations and organisations engaged in the climate change movement. It would also include engaged and passionate community members who can justify the skills and knowledge they would bring to the committee.

The Climate Advisory Committee would advise on the implementation of the Draft Climate Emergency Strategy, ensuring it is embedded into other aspects of Council procedures, monitor action outcomes and promote active community consultation and engagement.

Summary of Recommendations

1. ECNT recommends Council look towards the wide range of community organisations and service providers in Darwin to develop deeper connections with the people of Darwin, and in particular the disadvantaged members of our community who will be impacted first and hardest by climate change
2. We recommend a similar focus on climate adaptation in decision-making as what is being given to emissions reduction. Additionally, we recommend that a climate justice lens should be applied in all decision-making, in order to address the disproportionate impacts of climate change (and potentially of climate mitigation actions) on vulnerable groups
3. Council consider forming a Climate Advisory Committee
4. Council invest in resourcing greenhouse gas emissions baseline data so they are able to measure the success of implemented programs and communicate accurate data to the public. In addition to managing and reporting on carbon emissions, the Council monitor and report on the adaptation needs of the people of Darwin
5. Urge City of Darwin to ensure that any new council developments will comply with the most up to date Section J requirements irrespective of NTG adoption
6. Council must commit to and transition to purchasing 100% renewable energy
7. Ensuring solar PV or other renewable energy technology is included as a mandatory business-as-usual cost for all projects
8. Transition Council fleet cars to hybrid or electric models
9. We welcome the action to retrofit buildings however acknowledge that it is only broadly defined at this stage. We recommend this initiative includes parallel strategies for retrofitting council owned buildings as well as incentivising retrofitting of other commercial buildings in the municipality
10. Educate and engage with the community on energy efficiency
11. ECNT recommend that City of Darwin implement target diversion rates for each waste stream coming into the Shoal Bay Waste Management Centre
12. Conduct large scale community education programs, linked to diversion targets to inspire the community to change their behaviour and to provide guidance and transparency as to what Council is trying to achieve, and why this is relevant to climate change and greenhouse gas emissions
13. Introduce a fee at Shoal Bay for disposal of various types of household waste including general waste and bulky waste
14. We recommend that Council introduce high percentages of minimum recycled content percentages in all areas of Council procurement.
15. Council to introduce costly landfill fees at the Shoal Bay Waste Management Facility
16. ECNT recommends Council invest in the creation of a Territory-based food waste diversion industry and market
17. We recommend Council develop a local food security and resilience strategy and incorporate this into action outcomes from the Draft Strategy

Monitoring and transparency

ECNT note that the strategy lacks concrete data regarding the City of Darwin emissions profile. In line with clause 1.1 (Manage and report carbon emissions), we recommend that the Council invest in resourcing baseline data so they are able to measure the success of implemented programs and communicate accurate data to the public. This should involve monitoring and measurement of:

- Electricity (residential, commercial, industrial, internal Council use)
- Gas (residential, commercial, industrial, internal Council use)
- Transport (on road, air travel, public transport use rates, internal Council use)
- Percentage of energy that is coming from renewable sources for internal Council use, commercial, residential, industrial
- Waste from landfill broken into waste streams and then once again divided into residential, commercial, industrial, internal Council use
- Water – both wastewater and fresh water lost due to lack of harvesting / greywater / reuse options

Environment Centre NT recommend that City of Darwin should continue to collect data for a comprehensive understanding of GHG emissions. Darebin Council in Victoria developed their emissions profile to be consistent with the Global Protocol of Carbon Emissions reporting (GPC Protocol), the main international standard for cities and local government areas. ECNT recommend City of Darwin do the same.

There is currently no publicly available information for community members to gain an understanding of both an individual and collective impact. Real-time data allows Council targets to be transparent and encourages action from community and businesses.

As highlighted earlier, we commend the Council's willingness to take a holistic leadership role on climate change in the Darwin area. However, in line with the comments above, we argue that the Council's leadership be aligned with a capabilities approach to climate justice. We therefore recommend that, in addition to managing and reporting on carbon emissions, the Council monitor and report on the adaptation needs of the people of Darwin. This could involve collating information that already exists (for instance information from the Utilities Commission NT about electricity affordability and energy use) and resourcing the collection of further information (for instance the prevalence of and causes of energy poverty in Darwin). It could also involve collecting from the people and community organisations involved in the comprehensive engagement discussed above.

Energy Efficiency and Renewable Energy

Where the energy efficiency and renewable energy decisions fall outside of Council's jurisdiction, ECNT recommend City of Darwin strategically engage in discussions with various NT Government stakeholders to advocate for the following:

- The energy efficiency requirements of Section J in the National Construction Code (NCC) does not currently apply to commercial buildings in the Northern Territory. NTG are currently considering adopting Section J and at the time of writing are running a tender for a cost benefit analysis of doing so. We urge City of Darwin in being proactive in supporting the adoption of Section J of the NCC 2019 in the NT and in the case that Section J is not adopted, in incentivising developments to apply it either way. Similarly, we urge City of Darwin to ensure that any new council

developments will comply with the most up to date Section J requirements irrespective of NTG adoption.

- Advocate to the NT Government to increase minimum energy efficiency requirements for residential dwellings. Housing, and tenure, are important factors in how heat affects health. Vulnerable people are likely to be living in substandard housing, as are people who rent. This compounds vulnerability to deadly heat: inefficient homes get hot faster and are harder to cool. Airconditioning is a critical tool to reduce heatwave mortality, yet it is unavailable to many vulnerable people, either because it isn't present in their homes, or they cannot afford to operate it. The report by Canberra group [Better Renting, 'Home-Baked: Housing, Heat and Health'](#) (February 2020, Canberra, accessed online), made the following recommendations to decision makers:
 - Improve the energy efficiency of housing stock,
 - Increase vegetation and street shading,
 - Facilitate access to public cool areas,
 - Facilitate a transition from gas heating to reverse cycle air-conditioning (RCAC),
 - Encourage rooftop solar PV.

As quoted in the report, in the words of Annie Bolitho and Fiona Miller, “prolonged periods of extreme heat reveal social injustices.” (*A Bolitho & F Miller, 'Heat as emergency, heat as chronic stress: policy and institutional responses to vulnerability to extreme heat', in Local Environment, vol. 22, 2017, 682–698*). These measures will assist with adaptation and are likely to be of most benefit to more vulnerable households.

They will improve public health and improve community resilience. In the face of a changing climate, they will contribute to protecting the health and wellbeing of those members of our community who would otherwise bear the greatest burden.

- To the Northern Territory Government to increase their renewable energy targets. Power and Water, owns and operates the energy retailer Jacana Energy, which is the only energy electricity retailer for residential properties and supplies power to the majority of NT small, medium and large businesses including the NT Government, who consume 25% of all electricity consumed in the NT.
- The Discussion Paper does not reference NABERS ratings or Commercial Building Disclosure legislation, however these are key tools that are successfully driving sustainable operation of Australia's existing building stock. The NABERS scheme is Australia's preeminent environmental rating system for commercial buildings and applies to offices, shopping centres, hotels, public hospitals, data centres and apartment buildings. The Commercial Building Disclosure legislation applies to the owners of office buildings >1,000sqm and requires them to disclose the NABERS rating of the building when advertising for lease/sale. At the time of writing there are no certified NABERS Assessors based in the NT. This increases the cost of and serves as a roadblock to compliance with Commercial Building Disclosure legislation for office building owners. We urge the City of Darwin to play an active role in promoting the use of NABERS and compliance with Commercial Building Disclosure legislation and suggest the following potential ideas:
 - City of Darwin could train one or two of its engineering staff to become certified NABERS Assessors and deliver ratings in the City of Darwin as a fee-for-service

- City of Darwin could partner with the CitySwitch program (as has city councils of Adelaide, Sydney, Melbourne and Perth) to promote adoption of NABERS ratings for local commercial office tenants
- City of Darwin could promote and incentivise adoption of NABERS ratings for other building types in the municipality, in particular for our many apartment buildings
- We support the City of Darwin in promoting the adoption of solar and driving towards a low-emissions grid with distributed energy storage. However, we acknowledge that dramatic changes to energy demand of the Darwin municipality will have dramatic effects on the Darwin-Katherine grid, and these need to be strategically managed. We encourage City of Darwin take an active role with key stakeholders such as NTG, the network providers and retailers, to promote adoption of solar and other renewables industries in Darwin, with specific reference to recommendations of the NTG's Roadmap to Renewables report and Beyond Zero Emissions' 10 Gigawatt Vision.

ECNT recommend City of Darwin implement the following actions to enable achievement of the energy efficiency and renewable energy objectives outlined in the Draft Strategy. **These actions sit within Council's capacity** and commitment to their implementation would signify and reiterate the importance in investing in long term energy efficiency infrastructure and programs.

- **Council must commit to and transition to purchasing 100% renewable energy.** This is currently been done effectively by numerous Councils and even States and Territories in Australia.
- Ensuring solar PV or other renewable energy technology is included as a mandatory business-as-usual cost for all projects, to a size that meets the needs of the energy use of the building. For example, for solar PV to be included in the 2020 / 2021 Casuarina Pool development project
- Transition Council fleet cars to hybrid or electric models. This will increase the need for charging infrastructure and could be used as an education tool to encourage the community to switch to electric cars
- Ensure all new City of Darwin buildings and assets include onsite renewable energy generation and meet Section J of the NCC 2019 minimum energy efficiency standards, going above and beyond what is required in the NT, but in line with best practice Australia-wide.
- We welcome the action to retrofit buildings however acknowledge that it is only broadly defined at this stage. We recommend this initiative includes parallel strategies for retrofitting council owned buildings as well as incentivising retrofitting of other commercial buildings in the municipality. Building Upgrade Finance programs run by city councils of Melbourne, Adelaide and Sydney provide a blueprint for how a city council can provide financial incentives for retrofit projects outside of funding or grants schemes. Irrespective of guaranteed financial incentives, the city council should take a leadership role in promoting the benefits of building retrofits and providing reference material for building owners on how to go about it.
- Educate the residential community, potentially through collaborating with COOLmob, around:
 - How to retrofit an existing home to be more energy efficient

- What to look for when renting to choose a cheaper to run and more efficient home
- What to look for when choosing to buy a home
- Changes you can make at home that aren't as big as retrofitting – e.g. air-conditioning upgrades, shading, insulation, etc.
- Education the commercial community, potentially through collaborating with COOLmob and COOLmob Commercial, around how to retrofit an existing building to be more energy efficient. COOLmob Commercial is a business arm of COOLmob that helps Northern Territory businesses and institutions reduce their carbon footprint via energy efficiency and renewable energy projects that also reduce energy expenditure. Our aim is to provide a cost-competitive consulting service to identify energy saving solutions for sites within the NT.
- City of Darwin Council could partner with COOLmob to deliver a program similar to CitySwitch. [CitySwitch](#) helps office-based businesses to improve their energy and waste efficiency. The program assists commercial office tenants around Australia to enhance energy efficiency and reduce costs; manage energy price increases and mitigate business risks; work towards a carbon positive future; reduce waste and improve the health and productivity of employees.
- Educate the building industry, Chamber of Commerce, and local businesses, through the provision of resources, information sessions and workshops, to increase knowledge around why it is important that they support and pressure the NT Government to adopt Section J. Include information around lower building running costs, ability to attract tenants from organisations that require a leased building to be of a certain performing standard, energy efficiency wise.
- Invest and take a leadership role in developing community solar. Community solar refers to both **community-owned projects** as well as third party-owned plants whose electricity is shared by a community. Community solar projects:
 - Mobilise communities to act on climate change and take ownership of energy as they choose to generate renewable energy
 - Unique and opportunity for ordinary communities to create their own energy
 - Provides energy independence, security and affordability
 - Allows community the opportunity to share the benefits of solar power even if they cannot or prefer not to install solar panels on their property
 - Ethical investment or donation which can be used to subsidise low-income earners or community organizations' energy costs
- There are numerous models currently successfully leading community energy projects in Australia, including universities, community organisations and renewable energy retailers. Find resources and case studies here:
 - [Coalition for Community Energy \(C4CE\) – Small Scale Community Solar Guide](#)
 - [Community Power Agency – Community-owned Renewable Energy How-to Guide](#)
 - [UTS Institute for Sustainable Futures & Community Power Agency – Social Access Solar Gardens for Australia Research](#)
 - [Clean Energy Council – Benefit Sharing for Renewable Projects Guide](#)

Circular Economy and Waste

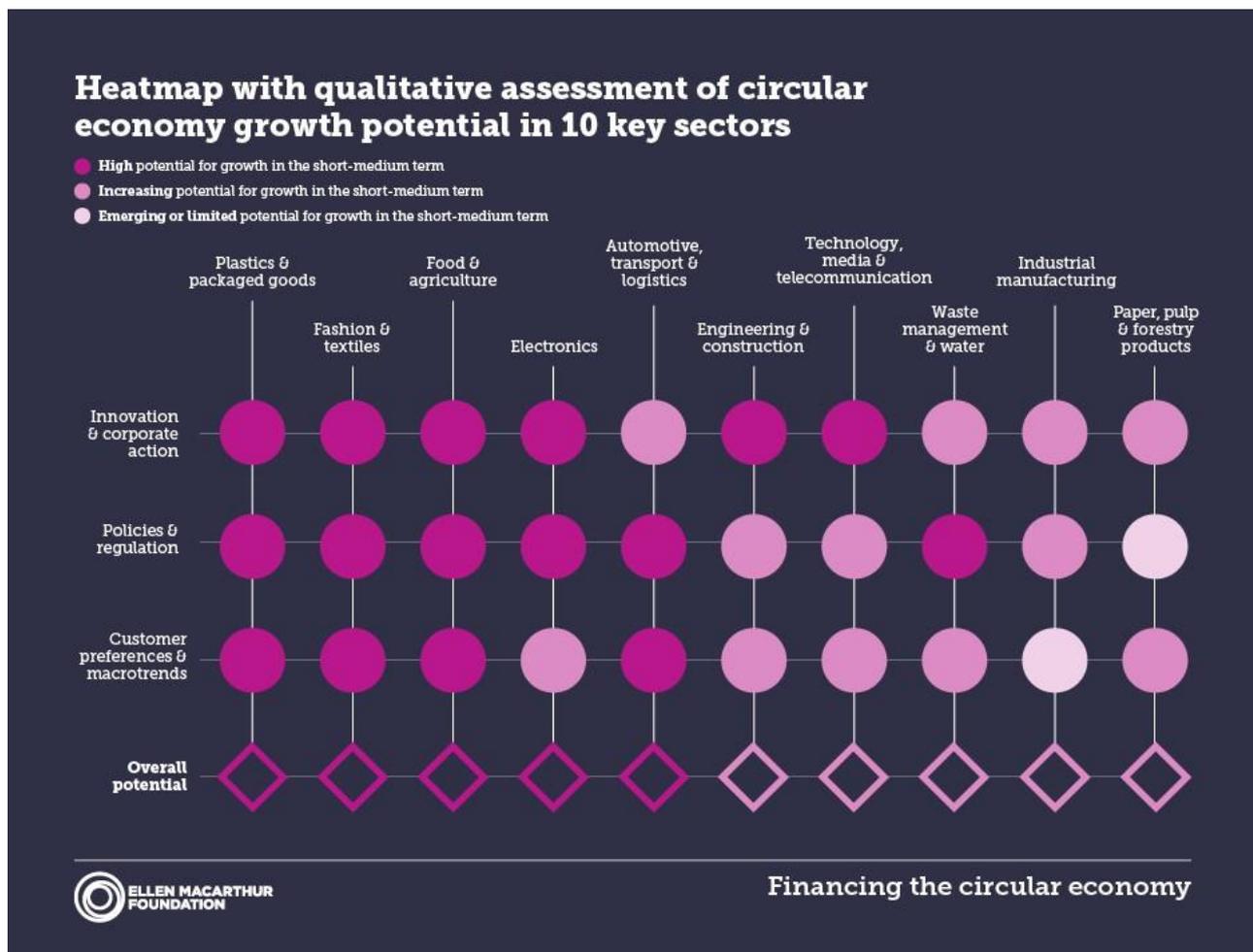
City of Darwin has identified that community produced waste emissions make up the largest source of the City's operational emissions, highlighting the vast amounts of

opportunity Council has if it were to invest and create pathways for a thriving circular economy.

Investment in and leadership in creating circular economy opportunities in Darwin is one of the most impactful ways ECNT see Council as being able to reduce their greenhouse gas emissions. At the time of commenting on the Strategy, The Morrison Government announced they will commit \$190 million to a new Recycling Modernisation Fund (RMF) that will generate \$600 million of recycling investment and drive a billion-dollar transformation of Australia's waste and recycling capacity. This seems like an exciting opportunity for the Council to take advantage of and we recommend they get involved in any way possible.

Circular economy opportunities can be found in nearly every sector in the global economy. The plastics, fashion, and food sectors stand out as some of the most likely to be significantly impacted or even disrupted by the circular economy in the near term, driven by innovation, regulation, and evolving customer preferences.

A new report from the Ellen Macarthur Foundation, [Financing the circular economy - Capturing the opportunity](#), brings new analysis that highlights the rapid growth in circular economy financing and investment across asset classes and sectors. The image below, taken from the Ellen Macarthur Foundation demonstrates a heatmap with a qualitative assessment of circular economy growth potential in 10 key sectors.



With the Waste Management Strategy not yet released, ECNT recommends that the Council use the recommendations put forward to the Climate Emergency Strategy to inform the Waste Management Strategy, ensuring a robust document.

Avoid and reduce waste at the source

Gather baseline data for each waste stream and create target diversion rates per stream

ECNT recommend that City of Darwin implement target diversion rates for each waste stream coming into the Shoal Bay Waste Management Centre, as this ensures the Council is accountable. It is a valuable tool which can be tied to education and maintaining interest and attention from the community in achieving these targets.

Council should conduct an in-depth audit for baseline data in each waste stream, followed by audits every two years to influence education and track diversion.

Council should compare waste diversion targets with other Councils in the area or that are also in isolated locations to ensure targets are ambitious but considerate of context.

If Council fails to separate electronic waste and other problem wastes from the domestic and commercial general waste stream it will lead to harmful chemicals and materials ending up in landfill as well as making the recovery and recycling of other materials more difficult.

Problem wastes can include electronic waste and mobile phones, paint, batteries, smoke detectors, fluorescent lamps, gas bottles, motor oils and fluids, pesticides and other toxic and hazardous household products.

Council needs to improve the availability of community services for collecting problem wastes as well as increase education of current programs. Consistent education message for the correct disposal of household problem waste is essential to create behaviour change and motivate the community.

Waste FREE NT and or COOLmob would be willing to assist with waste education programs around electronic waste and problem waste disposal. COOLmob previously ran a grant funded e-waste education project in 2016, and Waste Free NT already advocate and educate the community on how to dispose of mobile phones, e-waste and other hazardous materials.

Conduct large scale community education programs, linked to diversion targets to inspire the community to change their behaviour and to provide guidance and transparency as to what Council is trying to achieve, and why this is relevant to climate change and greenhouse gas emissions. [The waste education program, Second Nature at Waverly Council in Sydney](#), is an example of a creative, well-resourced yet simple program which provides all the information to residents in an easy to digest format, whilst also helping them understand why waste diversion by the individual in their home is important to reducing greenhouse gas emissions.

Reuse and recycle materials

Bulky goods and illegal dumping

Conduct a waste audit of what is being placed out in Cyclone collections. This will provide Council with baseline data around what the different items and volumes are being presented, and what percentage are contaminants.

Introduce a waste levy at Shoal Bay Waste Management Facility

An introduced gate fee will decrease the amount of useable bulky goods being sent to landfill outside of Cyclone clean ups by encouraging people to consider either re-

purposing themselves, selling secondhand or giving away, or stopping in at the Tip Shop at Shoal Bay.

As there is a correlation between rising costs of disposal and increased illegal dumping, Council needs to consider how they will deal with this. Education is a major factor in decreasing illegal dumping as is targeted and consistent fining of dumped items when there is enough evidence of the owner. If dumping 'hotspots' surface, installing cameras to identify the person or car dumping items is a proven method of reduction and prosecution in other areas of Australia.

Introduce a fee at Shoal Bay for disposal of various types of household waste including general waste and bulky waste, referring to items such as furniture, gym equipment, and non-recoverable kitchen and building waste that has come from the household source. It is considered best practise in Australia to charge a fee and is a successful incentive to encourage source separation.

If the fees change, consider whether it is financially viable to offer optional bin sizes, motivating people to send less to landfill.

Strongly encourage increasing prices for commercial operators to dispose of waste as this will incentivize self-sorting and recycling as much as possible.

Commercial and industrial waste

As Council has little regulatory control over the waste generated from commercial and industrial properties, focus needs to be on incentivizing businesses and multi-unit dwellings which operate under a commercial waste arrangement to decrease overall waste generation, increase recycling, increase source separation and decreasing food waste.

Council could implement a range of incentive programs which focus on these key four areas by drawing on successful programs already in motion around Australia. Education is fundamentally important to any success in decreased waste generation and increased landfill diversion and should be the basis of any programs.

Successful projects City of Darwin could draw inspiration from include the NSW EPA Business Love Food Hate Waste, teaching businesses how to reduce their food waste, the NSW EPA Bin Trim Program which offers a free recycling service to businesses to maximize their recycling and minimize their landfill, the [Melbourne Degraeves Street](#).

Waste Free NT and COOLmob are able to assist Council with education programs, as they both have demonstrated success in delivering effective, business and community waste education. Waste Free NT were extremely instrumental in providing the education to all stallholders at Darwin markets including Parap, Mindil, Rapid Creek, Malak and Nightcliff on the single use plastics ban coming into effect in 2019. They did this through one-to-one education using 'allowable' products and breaking down various barriers including language, cultural, market as well as perceived loss of business and customer dissatisfaction.

Additionally, Waste Free NT played a vital role in raising awareness and educating the community and about the need to move away from single use packaging, demonstrated through their bi-monthly stalls at the various food markets, engaging Facebook and Instagram pages, and workshops conducted at the Seabreeze Festival.

Construction and demolition waste

As local government has little to no regulatory control over waste generated from commercial and industrial sources, it is important that Council focuses on assisting and promoting the development of closed loop systems that incorporate local market opportunities.

We recommend that Council introduce high percentages of minimum recycled content percentages in all areas of Council procurement. Capital works projects such as roads could easily incorporate recycled construction and demolition waste, decreasing their carbon footprint and increasing a demand for recycled goods on the market. This could be provided as a case study or advocacy to NT Government to use Territory wide.

Additionally, it is not evident that Council provide any education to the building industry about correct waste disposal. The first step towards this is through increased signage at the landfill, increased fees for certain types of waste as well as increased surveillance on site to ensure transparency. Council could partner with industry to host education sessions for all sectors of C&D industry.

Reduce, divert and process organics

ECNT recommends Council invest in the creation of a Territory-based food waste diversion industry and market. To do this, Council should conduct a feasibility study into other local government organic waste collection systems and engage with industry through a tender process.

Investment in a food waste diversion program would be one of the most effective ways for Council, within their capacity, to decrease greenhouse gas emissions and facilitate circular economy markets in the NT. Darwin prides itself on being a global city, and such leadership could mean an innovative program that is used as a viable case study for other remote places around Australia.

Council could potentially develop a trial system, tied to education, involving a combination of voluntary households, multi-unit dwellings, commercial clients and randomly selected households to ascertain realistic results around logistics and contamination. Such a trial program could look to partnering with existing local businesses to determine long term viability whilst a new, large industry is developed.

Council has indicated that they are hesitant to invest in a food waste diversion system with current rates of contamination in the residential waste stream. This is an unfounded argument as Council is currently not actively providing education to the community around contamination, and does not publicly engage with the community around diversion rates. Introducing a food waste system, accompanied by a deep engagement education program would allow Council to harness the attention of community and re-educate incorrect behaviours.

Transport

ECNT recommends Council should play a leadership role in the transition to emission-free transportation. Council should immediately commit to transitioning its fleet to electric/hybrid vehicles and engage with the NTG and Federal Governments to ensure adequate renewable charging infrastructure.

In regards to community generated transport emissions, ECNT recommends Council:

- Provision of consumer incentives such as subsidies, or the coordination of bulk electric vehicle purchase schemes to reduce costs, in partnership with the NT Government, and investment in charging stations
- To reduce municipal transport emissions, initiatives for council to consider could include: offering free parking for rideshare vehicles, EVs and hybrids; supporting a shopping voucher program for rideshare users
- End of trip showering facilities at multiple convenient locations around the city
- Investment in safer and more accessible bike lanes and routes around the city with greater connection to the suburbs

Food Resilience

ECNT notes that There is no reference of local food and food security, which is vital if we are to become a sustainable and livable city. We recommend Council develop a local food security and resilience strategy and incorporate this into action outcomes from the Draft Strategy. Local food resilience is critical to ensuring food security and connecting local communities with opportunities to grow and eat locally produced produce. Council could look towards what the recently developed [Greater Bendigo Food System Strategy 2020 – 2030](#) as an example of a robust, ambitious and evidence based strategy centered on deep community engagement.

ECNT recommends Council partner with and fund grassroots organisations, such as GULP NT, COOLmob and community gardens, with the knowledge and capacity to effectively engage with and educate around local food resilience, through resource development, videos and workshops.

The Environment Centre NT is excited to see follow the implementation of the Draft Strategy and hopes to be involved as a key stakeholder in ongoing decision making.