



Biodiversity Council

Submission to the next ACT Climate Change Strategy

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About The Biodiversity Council

The Biodiversity Council brings together leading experts including Indigenous knowledge holders to promote evidence-based solutions to Australia's biodiversity crisis. The Council was founded by 11 universities with the support of Australian philanthropists.



Introduction

The Biodiversity Council welcomes the opportunity to provide feedback on the [next ACT Climate Change Strategy Discussion Paper](#) ('Discussion Paper').

Our understanding

In 2019, the ACT government released the ACT [Climate Change Strategy 2019-25](#) ('2019 Strategy'). The Discussion Paper has been released to inform the development of a new Climate Change Strategy for 2026-2035. The Strategy is intended to form an overarching framework that supports 2-4 year action plans.

The 2019 Strategy identified the following goals and actions under the land use and biodiversity theme:

Goal	Action
7A Protect local species and habitats	<p>7.1 Identify opportunities to increase resilience of terrestrial and aquatic habitats at risk from climate change and implement land management changes and relevant onground works with delivery partners.</p> <p>7.2 Ensure action plans for threatened species and communities consider the impact of climate change.</p>
7B Sequester carbon in the landscape	7.3 Identify suitable sites in the ACT for 'carbon sinks' and develop a plan for planting trees or using soil carbon in these areas to sequester carbon with consideration of biodiversity outcomes and competing land uses
7C Encourage sustainable and resilient farming	7.4 Encourage sustainable farming practices which are fit for the current and future climate and enhance soil and water quality, and work with farmers to identify opportunities for net zero emissions farming and innovation to increase resilience.

The Discussion Paper replaces the land use and biodiversity theme with a natural environment theme. Under this theme the Discussion Paper includes a vision, outlines why the natural environment is important, what the ACT government is doing and proposed next steps. The Discussion Paper is very brief and there are significant gaps both relative to the content of the 2019 Strategy and in general what strategic policy documents should contain.

Our key concerns are outlined below.

Key concerns

1. The natural environment vision needs improvement

The vision for the natural environment for 2035 is “looking after nature is at the heart of our climate change action”.

Unlike most visions it does not describe a desirable future goal or state of the system. Rather it is process-based.

This stands in contrast to the visions for the other themes in the Discussion Paper:

Embedding equity, wellbeing and resilience:

“The ACT’s climate action efforts will empower everyone in our community including individuals, households, schools, businesses, and community groups to become more resilient, transition to net-zero, and build stronger community connections.”

Transport:

“Canberrans have multiple low-carbon transport options for moving around our city, including safe, accessible and convenient public and active transport, as well as zero-emissions vehicles.”

Built environment vision:

“Our built environment is driving emissions reductions and improving liveability in a changing climate.”

Energy:

“The ACT continues to be at the forefront of electrification and phasing out fossil fuel gas with a focus on a just transition supporting those who need it most.”

The absence of a desirable future goal or state of the system makes it more difficult to motivate and coordinate people to act. Moreover, the ambiguity about ‘looking after nature’ and ‘the heart of’ leaves the vision open to interpretation about what this looks like in the real world. This contrasts with more measurable concepts like ‘net-zero’, ‘zero-emissions’, or ‘emissions reductions’.

The natural environment’s ‘vision’ may have been framed this way due to the uncertainty in predicting the impact of climate change on the natural environment and the inevitability of undesirable changes. It would be preferable to describe this problem and outline how it will be navigated (see point 3 in this submission for suggestions related to this).

Some example vision statements that accommodate uncertainty and change but are more specific and describe a future state include:

- The natural environment is healthy and biodiverse. Nature-based solutions are the first preference for managing climate change and disaster risk, and are designed to deliver co-benefits for biodiversity.

- The natural environment is able to respond to the disruptions of climatic and other events. Changes to ecosystem services are anticipated and managed.
- Threatened species are on the path to recovery and key climate refugia are protected and/or enhanced.

Recommendation 1: *The Biodiversity Council recommends that the ACT government reformulate the natural environment vision to describe a desirable future goal and to be clear about the uncertainties with predicting impacts on the natural environment.*

2. The success of current actions should be evaluated

The Discussion Paper notes that:

“Where needed, we will build on existing measures to improve the resilience of threatened species as well as identify and prioritise action for species at risk of immediate harm from climate change.

We will investigate opportunities and challenges involved in enhancing resilience, reducing on-farm emissions, and contributing to the natural environment’s role as a carbon sink.”

However, there is a lack of information about the success (or otherwise) with existing measures to build resilience of threatened species. There doesn’t appear to be any analysis of whether the goals in the 2019 strategy were achieved.

Monitoring, evaluation and learning are critical for effective climate change adaptation,¹ yet this is missing from the Discussion Paper. Basic evaluation questions² must be answered in order to set goals and targets for the revised Strategy and to identify priority actions.

Recommendation 2: *The Biodiversity Council recommends that the ACT government undertake an evaluation of the implementation of the actions in the 2019 Strategy and their effectiveness in achieving their stated goals.*

¹ See IPCC, 2022: Summary for Policymakers [H.-O. Pörtner, D.C. Roberts, E.S. Poloczanska, K. Mintenbeck, M. Tignor, A. Alegría, M. Craig, S. Langsdorf, S. Löschke, V. Möller, A. Okem (eds.)]. In: *Climate Change 2022: Impacts, Adaptation and Vulnerability. Contribution of Working Group II to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change* [H.-O. Pörtner, D.C. Roberts, M. Tignor, E.S. Poloczanska, K. Mintenbeck, A. Alegría, M. Craig, S. Langsdorf, S. Löschke, V. Möller, A. Okem, B. Rama (eds.)]. Cambridge University Press, Cambridge, UK and New York, NY, USA, pp. 3–33, doi:10.1017/9781009325844.001. https://www.ipcc.ch/report/ar6/wg2/downloads/report/IPCC_AR6_WGII_SummaryForPolicymakers.pdf

² What is the state of the system now? What are the current problems? What approaches did we previously use to address these problems? Did they work? Why or why not? What has changed in the system that necessitates a change in approach? etc.

3. It is unclear what actions will be proposed

There are opportunities for the Discussion Paper to identify high-priority actions that should be undertaken to build the resilience of the natural environment.

These should include identification of climate refugia, vulnerability assessments for threatened species and communities, and analysis and planning for likely changes in key ecological processes such as fire frequency, precipitation and run-off. The [Biodiversity Council's report](#) to the South Australian government regarding management of biodiversity in a changing climate may be helpful.

It is necessary to reconsider how to integrate climate change into planning and management approaches. Traditional planning approaches and the development of static plans, which assume future conditions will mirror past conditions are ill-suited for climate adaptation.

A better approach is for decision-makers to systematically examine strategies over a wide-range of plausible futures. These 'futures' are scenarios about what could happen.

There are a wide variety of futures-based approaches to adaptation planning. For the natural environment, the Resist, Accept and Direct and the Adaptation Pathways approaches are likely to be helpful. Parks Victoria is using the Resist, Accept and Direct³ approach in some national parks to help identify the appropriate climate adaptation responses to specific landscape features or elements that are ecologically or culturally important. The Victorian Catchment Management Authorities have found that the Adaptation Pathways⁴ approach has been very useful to help stakeholders consider potential futures under climate change, including accepting that there is likely to be a decline or loss of some natural assets.

Recommendation 3: *The Biodiversity Council recommends that the Strategy indicate priority actions for the natural environment beyond those that are included in the 2019 Strategy. These should include: identification of climate refugia, vulnerability assessments for threatened species and communities, and analysis and planning for likely changes in key ecological processes. The Strategy should also identify preferred planning approaches that enable managers to navigate uncertainty.*

4. There is no theory of change

The Discussion Paper and the 2019 Strategy lack a theory of change showing how the actions will lead to vision, including: outcome targets, intermediate outcome targets, activity or action targets, co-dependencies and assumptions.

³

<https://adaptlandandsea.org.au/wp-content/uploads/2025/07/Adapt-LandandSea-Case-Study-Parks-Victoria-RAD.pdf>

⁴ https://www.swclimatechange.com.au/cb_pages/adaptation_pathways.php

A theory of change would help guide design of actions and support future evaluation and improvement of the Strategy.

Recommendation 4: *The Biodiversity Council recommends that the Strategy include a clear theory of change.*

5. The Discussion Paper takes a siloed approach

All sectors will be affected by climate change, and we can expect interaction between the sectors in how they respond. Climate change is likely to exacerbate existing trade-offs and conflicts over use of land and water if we do not undertake strategic and collaborative planning.

The [National Climate Risk Assessment](#) identified a key governance problem with how interactions between systems can generate and transfer risks to other systems. It emphasised the need for cross-system collaboration for positive adaptation outcomes.⁵

By their very nature, cross-system risks are subject to problems with unclear responsibilities and trade-offs. To adequately address them, whole-of-government approaches that focus on societal outcomes and transcend established institutional boundaries are likely to be required.

The Discussion Paper is silent on cross-system risks and how they should be addressed.

Recommendation 5: *The Biodiversity Council recommends that the Strategy better integrate between systems including identifying cross-system risks and approaches to resolving them.*

⁵ See the Priority risk snapshot: Governance.