

Services Australia net zero action plan

Achieving net zero greenhouse gas emissions
in the APS by 2030

January 2026

Contents

Purpose.....	3
Net zero greenhouse gas emissions.....	3
Current state	3
Environmental sustainability	4
Building performance.....	4
Other measures	5
Key actions to achieve net zero emissions	6
Key initiatives we've undertaken to achieve net zero emissions.....	7
Summary of progress.....	7
Renewable energy procurement.....	8
Solar photovoltaic (PV) upgrades.....	9
LED lighting upgrades	10
Improving building performance	11
Fleet transition and charging infrastructure	12
Sustainable procurement.....	13
Data centre transition.....	14
Carbon offsets	14
Additional initiatives.....	14
Agency reporting and monitoring requirements.....	16
Staffing and resourcing.....	16
Investment in net zero emissions	17
Alternative funding options.....	17
Appendix A – NZGO targets and measures	19

Purpose

Services Australia (the agency) has an essential role in managing and implementing emissions reduction initiatives set by the Australian Government through the Department of Finance's (Finance) Net Zero in Government Operations (NZGO) policy. NZGO represents the foundation for the Australian Government's approach to achieving net zero greenhouse gas emissions in its operations and to publicly report on these emissions.

The agency has commenced its net zero emissions pathway in line with the direction set by Finance and NZGO policy. This includes:

- prioritisation of sites for focusing emission reduction efforts
- establishing monitoring and reporting protocols and sharing of data between landlords and tenants
- investing in decarbonising energy contracts, property portfolios, fleet and operations
- providing resources for building staff capability and empowering them to be strong sustainability leaders.

This action plan sets out the steps we'll take to help achieve net zero in the APS by 2030. The plan encompasses new and existing initiatives from the agency to benefit emissions reduction and contribute to meeting this target.

Net zero greenhouse gas emissions

Net zero greenhouse gas emissions refers to achieving balance between greenhouse gas emissions produced and greenhouse gas emissions taken out of the atmosphere.¹ From an agency perspective, this means minimising the amount of greenhouse gas emissions that we emit, within our control.

Net zero is achieved when consumption of resources, such as electricity, is reduced as far as possible, energy is supplied from renewable sources, and where remaining, unavoidable greenhouse gas emissions² are balanced through carbon offsetting.³

Current state

As of 30 June 2025, we have 392 sites covering 623,450m² and emitted approximately 59,527 tonnes of carbon dioxide equivalents (tCO2-e).

The source of these emissions is broken into 3 scope categories, with our main source of emissions coming from purchased electricity (over 90%) in the scope 2 and 3 categories. This represents one of the key action areas for our emissions reduction.

Figure 1 represents our emissions sources in further detail and states our baseline emissions from 2022–23.

Scope	Definition	Agency emissions	Baseline (2022–23)	Current year (2024–25)
Scope 1 'Direct' emissions	Emissions from operations that are owned or controlled by the agency.	<ul style="list-style-type: none"> • Fuel used in fleet vehicles • Natural gas used in tenancy of leased buildings 	799 tCO2-e	940 tCO2-e
Scope 2	Emissions from the generation of purchased electricity, heating or	<ul style="list-style-type: none"> • Purchased electricity 	59,492 tCO2-e (majority of	55,648 tCO2-e ⁴

¹ Climate Council.

² Greenhouse gases are gases in the atmosphere such as water vapour, carbon dioxide, methane and nitrous oxide that can absorb infrared radiation, trapping heat in the atmosphere.

³ Carbon offset refers to projects that reduce, remove or capture emissions from the atmosphere such as reforestation, renewable energy or energy efficiency.

Scope	Definition	Agency emissions	Baseline (2022–23)	Current year (2024–25)
'Indirect' emissions	cooling consumed by the agency.	agency emissions		
Scope 3 'Indirect' emissions	All indirect emissions not included in scope 2 that occur in the supply chain of the agency, including both upstream and downstream emissions.	<ul style="list-style-type: none"> • Data centre services • Water consumption • Waste generation • Electricity and gas used for landlord central services • Refrigerant leakage from landlord air conditioning 	8,772 tCO2-e	10,136 tCO2-e
Total emissions			69,063 tCO2-e	66,724 tCO2-e

Figure 1: Agency emissions sources

Environmental sustainability

We have several sustainability measures in place to improve environmental performance and reduce emissions across building operations, fleet, procurement and waste areas.

Building performance

Well-designed and efficient buildings are essential to creating a more sustainable environment. The agency includes environmental sustainability minimum standards for precinct projects, as seen in Figure 2.

Adelaide precinct (completed in 2023)	Brisbane precinct (completed in 2025)
<ul style="list-style-type: none"> • Carbon neutral • 6-star Green Star • 5-star National Australian Built Environment Rating System (NABERS) energy (base building) • 4-star NABERS water (whole building) • WELL platinum rating 	<ul style="list-style-type: none"> • 80KW dedicated solar PV • 6-star Green Star • 5.5-star NABERS energy (whole building) • WELL platinum rating

Figure 2: Precinct projects

For existing buildings, we actively target emissions reduction through a number of actions, as outlined in Figure 3.

Category	Action
Green Lease Schedules (GLS)	<ul style="list-style-type: none"> • Incorporating GLS into lease agreements for offices over 1,000m².
NABERS and Energy Management Plans (EMPs)	<ul style="list-style-type: none"> • Manage and monitor GLS, NABERS and EMPS obligations, collaborating with landlords to improve and maintain site efficiency. • Conducting NABERS energy assessments and managing building performance through EMPS.

Category	Action
	<ul style="list-style-type: none"> • 101 sites with current NABERS ratings. • 46 EMPS.
Solar photovoltaic (PV) and LED lighting	<ul style="list-style-type: none"> • Installation of on-site renewable energy, such as solar PV systems and upgrade of lighting to LED will be negotiated in lease agreements. • Both these actions will reduce site emissions and improve energy efficiency.
Strategic property planning	<ul style="list-style-type: none"> • Co-locating staff in shared premises arrangements and consolidating footprint into precincts. • The Brisbane precinct opened in August 2025 and has seen the consolidation of 12 sites, including the closure of 7 and footprint reductions in 5 service centres.
Environmental sustainability reporting	<ul style="list-style-type: none"> • Online energy and sustainability performance reporting system changes to improve our reporting and performance capabilities.

Figure 3: Agency emissions reduction actions

Other measures

We have several additional measures that target emissions reduction and environmental sustainability (Figure 4).

Category	Measures
Fleet transition and charging infrastructure	<ul style="list-style-type: none"> • Procuring low emission vehicles (LEV) in line with the Australian Government Fleet Vehicle Selection Policy. • Use of an electronic logbook system to accurately monitor and manage vehicle use and to improve reporting quality and make better decisions with regards to fit-for-purpose vehicle selection.
Sustainable procurement	<ul style="list-style-type: none"> • Purchasing 100% recycled content paper for internal printers, photocopiers and multifunction devices. • Consulted with Department of Climate Change, Energy, the Environment and Water (DCCEEW) to assist in re-developing the Environmentally Sustainable Procurement Policy (ESPP) to include net zero emissions considerations and encourage a circular economy through suppliers. • Consulted with Procurement Branch to strengthen procurement templates around environmental sustainability and environmental-related criteria for procurement evaluations.
Waste management	<ul style="list-style-type: none"> • The agency's Waste Management Plan benefits outline waste disposal best practice and: <ul style="list-style-type: none"> – reduced landfill waste and carbon emissions – increased resource recovery through recycling – costs reduced or avoided through reduced waste collection by contractors and a reduction or avoidance of landfill waste – additional time diverted to cleaning, rather than waste collection from under desk bins.

Figure 4: Other agency measures for emissions reduction

Key actions to achieve net zero emissions

Our current sustainability measures aren't enough to achieve net zero. To achieve this, we'll undertake more targeted action on existing measures and introduce further new measures. This includes:

- procuring renewable electricity
- improving building standards
- transitioning our petrol vehicles to low emission vehicles
- sustainable procurement.

These actions are supported by carbon modelling, undertaken by our property service provider, Jones Lang Lasalle (JLL). The modelling projects emissions reduction based on targeted actions, such as renewable energy procurement, and allows us to track emissions towards achieving net zero by 2030. The actions are also guided by NZGO targets and are summarised in Figure 5.

Category	NZGO target/measure	Action by agency
Renewable energy procurement	Replace existing coal-fired electricity contracts with renewable energy contracts.	<ul style="list-style-type: none"> • Procure renewable energy through Finance Renewable Energy Panel from 2025 as current contracts expire.
Improve building standards Green Lease Schedule (GLS) Energy Management Plan (EMP) National Australian Built Environment Rating System (NABERS)	Office space leased from 1 July 2025 over 1,000m ² to include GLS and meet National Australian Built Environment Rating System (NABERS) standards as set out in the NZGO strategy.	<ul style="list-style-type: none"> • Include GLS in leases for office spaces 1,000m² and over. • EMPs to be included in GLS requirement of leases. • Manage and monitor GLS, NABERS and EMP obligations and collaborating with landlords to improve and maintain site efficiency.
Fleet transition	75% of Fleet orders for EV by 2025.	<ul style="list-style-type: none"> • Transition petrol to LEVs. • Rollout of EV infrastructure installation.
Sustainable procurement	Implementation of C-SPARC Sustainable Procurement Policy. Incorporate elements into our Sustainable Properties Policy and framework.	<ul style="list-style-type: none"> • Incorporate sustainable procurement approach into Agency Sustainable Properties Policy and framework. • Support the promotion of sustainable procurement across the agency.

Figure 5: Key actions to achieve net zero emissions

Key initiatives we've undertaken to achieve net zero emissions

Initiative	Action
Renewable energy	Transition electricity contracts to include up to 100% green power.
Solar PV	Negotiating into leases for increased renewable energy and reduced electricity costs.
LED lighting	Negotiating into leases for increased energy efficiency and reduced electricity costs.
Building performance	Include GLS in leases for all applicable office spaces.
Electric vehicle transition	Transition of petrol fleet vehicles to LEVs and installation of charging infrastructure.
Sustainable procurement	Support the sustainable procurement policy.

Summary of progress

Figure 6 is a high-level overview of progress against the actions outlined in this plan.

Action	Progress
Emissions reporting	We've completed emissions reporting for the third year. In 2025, we expanded emission sources to include renewable energy, solid waste, accommodation and hire cars.
Improving building standards	Net zero inclusions were added to: <ul style="list-style-type: none"> • Base building and face to face performance specifications • Heads of agreement documents.
Transition of petrol fleet to LEVs and installation of EV charger infrastructure	<ul style="list-style-type: none"> • 156 LEVs delivered across agency sites • 26 sites fully operational with EV charges • 13 sites currently installing EV chargers • 72 sites under negotiation to install EV charges.
LED lighting and solar photovoltaic (PV) upgrades	LED lighting and solar PV requirements are included in all lease negotiations and written into leases where landlords have agreed.

Action	Progress
Sustainable procurement	We worked closely with DCCEEW on the development of the ESPP.
Communication plan	<ul style="list-style-type: none"> Our net zero action plan was published on the intranet for all staff in November 2024. In 2024–25, articles promoting sustainable activities and initiatives were posted to News Hub, Viva Engage and the Huddle. The action plan will be updated annually.
Waste management	<ul style="list-style-type: none"> Our Waste Management Plan was updated in April 2025 and made available on the intranet for all staff. Agency waste services have been realigned to be fit for purpose and meet business requirements, reducing landfill and increasing recycling. In 2025, recycling was introduced to 76 additional sites. In January 2025, under-desk bins were removed.
Environmental Sustainability Policy	<ul style="list-style-type: none"> Our Environmental Sustainability Policy was updated to reflect the inclusion of the net zero action plan and targets. The policy is available for all staff on the intranet and will be promoted through News Hub articles. The policy will be updated annually.

Figure 6: Progress against actions

Renewable energy procurement

Over 90% of the agency's emissions are from purchased electricity.

Within Powering Australia, a key enabler for the APS to reach net zero greenhouse gas emissions by 2030 is described through procuring renewable energy, including with power purchase agreements (PPAs). As over 90% of our emissions are from purchased electricity, renewable energy is a key priority area for us to reduce emissions.

Through the development of the NZGO strategy, Finance has assessed options and formed a strategic direction on the most efficient way to transition to renewable energy. This included implementing a mandatory centrally-managed whole of government approach to procuring renewable energy. This allows a well-informed and strategic approach to renewable energy transition across the APS.

Our current contracts will be transitioned upon contract expiry to whole of government renewable electricity contracts as outlined in Figure 7 (excludes NT due to non-contestable electricity provision).

Contract type and supplier	Agency contract end date
Large market – ACT (ActewAGL)	30 June 2026 (Department of Defence contract)
Large market – WA (Synergy)	31 December 2026

Contract type and supplier	Agency contract end date
Small market – ACT, NSW, VIC, TAS, SA, QLD (Shell)	31 December 2027
Large market – NSW, VIC, TAS, SA, QLD (Shell)	31 December 2026
Complex market – NT (various)	Various – 1 month notification required

Figure 7: Current electricity contracts

Renewable electricity – what the agency will do	
Review contracts	<ul style="list-style-type: none"> Review of small and large market contracts and confirm feasibility of transition to renewable electricity.
Consider next steps	<ul style="list-style-type: none"> Next steps informed by Finance through whole of government renewable energy procurements. We'll transition to whole of government renewable energy contracts once procurements are finalised by Finance and upon expiry of current agency contracts. In the event of delays to whole of government contracts, we'll extend current contracts as necessary until transition to renewable contracts are ready.
Communicate	<ul style="list-style-type: none"> Consultation with key stakeholders including Property Branch, Chief Financial Officer (CFO) and Procurement Branch on procurement. Cost implications associated with power procurement transition determined and communicated to CFO and Procurement Branch. Electricity Contract Transition Plan in place and regularly updated to inform progress and uptake as new contracts implemented.

Figure 8: Renewable electricity – what the agency will do

Solar photovoltaic (PV) upgrades

We'll roll out solar PV upgrades for our sites where possible through leasing events.

Solar energy is a clean renewable energy source that creates no greenhouse gas emissions. It reduces the impact on electricity grids and reduces electricity bills. However, it's important to note that there may be high installation costs and energy storage options required to maintain supply during periods of inclement weather. Roof space availability is another limiting factor for solar PV systems.

In 2022, JLL, on behalf of the agency, conducted a desktop review of 55 GLS sites and 164 properties of more than 1,000m² net lettable area for rooftop solar PV system suitability. Several sites were excluded due to a number of prevailing factors, for example, already having solar PV installed, unsuitable roof area or metering configuration or imminent lease disposal.

For 50 sites that met the criteria for solar upgrades (no existing solar, roof space availability, positive return on investment), the following information was gathered:

- solar PV capacity based on spatial estimates from aerial imagery

- yield and self-consumption rate
- costs and return on investment
- emissions reduction potential (derived from carbon modelling).

Solar PV upgrades – what the agency will do

Confirm leasing strategy	<ul style="list-style-type: none"> • Confirm leasing strategy for our sites.
Site confirmation	<ul style="list-style-type: none"> • Confirm priority sites based on leasing strategy.
Lease negotiations	<ul style="list-style-type: none"> • Incorporate solar PV into lease negotiations with landlords by Services Australia Leasing and National Accommodation Management.

Figure 9: Solar PV upgrades – what the agency will do

LED lighting upgrades

We'll roll out LED lighting upgrades at our sites where possible through leasing events.

LED lighting is an energy-efficient and rapidly developing technology that is replacing the standard fluorescent lighting in office buildings. Aside from energy efficiency, LEDs have several advantages over other lighting types including being safer, longer-lasting and easy to install.

In 2022, a desktop review was conducted to identify existing lighting type and controls at 55 Green Lease Schedule (GLS) sites. For the sites that demonstrated potential (no existing LED, high electricity usage, existing Tenancy Lighting Assessment categorised as 'poor') for LED lighting upgrades, they found:

- energy and expenditure savings
- upgrade costs and return on investment
- emissions reduction potential (derived from carbon modelling).

A screening exercise was also conducted for non-GLS sites equalling or larger than 1,000m². Sites without a GLS and smaller than 1,000m² were deemed out of scope. Eight GLS sites and 119 non-GLS sites have been identified for LED upgrades as a result of the screening exercise.

LED lighting upgrades – what the agency will do

Confirm leasing strategy	<ul style="list-style-type: none"> • Confirm leasing strategy for our sites.
Detailed feasibility study	<ul style="list-style-type: none"> • Conduct detailed feasibility study on selected sites, where required.
Lease negotiations	<ul style="list-style-type: none"> • Incorporate LED lighting requirements into lease negotiations with landlords by Services Australia Leasing and National Accommodation Management.

Figure 10: LED lighting upgrades – what the agency will do

Improving building performance

New buildings

Action: For new office spaces greater than \$15 million in value, they must obtain Green Building Council of Australia Green Star Design and As Built rating of 4, NABERS energy rating of 6-star or higher and be all-electric buildings, including building heating, cooling and water heating.

The NZGO strategy introduced several targets for all new buildings and office spaces. These apply to the agency as outlined in Appendix A.

The following sections outline how we'll achieve these targets and improve energy efficiency for new buildings, including those applicable from 1 July 2025 and 1 July 2026.

Existing buildings

Action: From 1 July 2025, obtain NABERS ratings of 5.5 stars (4.5 for regional locations) to leases of 4 or more years and office spaces that are 1,000m².

We'll improve energy efficiency through certifications and ratings. National As Built Environmental Rating System (NABERS) is an environmental performance rating system assigned to agency buildings where applicable. It's used to accurately measure the environmental performance of a building and identify areas for future improvement.

To achieve this, we incorporate emissions reduction activities that positively impact NABERS ratings (such as LED lighting and solar PV) into lease negotiations. We also incorporate NZGO requirements into lease events prior to 1 July 2025 to future-proof energy efficiency of leased buildings.

Office fit-outs or refurbishments

Action: From 1 July 2026, we'll achieve a 5.5 Star NABERS energy rating for fit-outs or refurbishments for leases of 4 or more years, and office spaces that are 1,000m². We'll amend the agency's fit-out guide.

An office fit-out or refurbishment represents an opportunity to make sure our office spaces are fit for purpose. It also allows upgraded environmental sustainability measures to be incorporated, such as using recycled products to support a circular economy.

To achieve this, the current fit-out guide will be revised to support this target.

Expand Green Lease Schedules

Action: From 1 January 2025, we'll incorporate GLS into leases (4 or more years) for offices 1,000m² or more of NLA. We'll expand our portfolio of 55 Green Lease sites to sites more than 1,000m²

Green Lease Schedules (GLS) are a type of leasing arrangement developed by the former Department of the Environment and Water Resources and the Australian Government Solicitor (AGS) for government agencies. They contain mutual obligations for tenants and owners of office buildings to achieve efficiency targets. The GLS improve energy efficiency by setting a minimum ongoing operational building energy performance standard.

A process for collecting base building electricity consumption data via landlords will be developed with a view to better understanding scope 2 and 3 emissions. This will then be used to further inform site-specific emissions reduction strategies.

Commonwealth National Lease

The Commonwealth National Lease (CNL) is a leasing template used by Commonwealth tenant entities. It's designed to assist Commonwealth tenant entities with lease negotiations, as using standard form documents can reduce the time and costs associated with negotiations.

The current CNL was reviewed in late 2024 and now incorporates environmental sustainability and emissions reduction clauses.

Improving base building minimum performance specifications

Action: Review and consolidate base building minimum performance specifications for new and existing buildings over and under 18,000m².

Separate to the CNL review, we reviewed existing building specifications and incorporated requirements to support NZGO policy.

Measures to achieve energy efficiency for buildings

Action: Implement energy efficiency measures at Services Australia sites.

We'll also implement several additional sustainability-related actions that contribute to achieving improved energy efficiency for our buildings, as well as meeting the targets set by NZGO. This will allow us to set and maintain a high standard of environmental performance in the APS.

Energy efficiency measures	
All sites	<ul style="list-style-type: none"> • Target Premium WELL rating where possible. • Environmentally friendly and low-harm product selection. • Improved metering provisions, such as sub-metering. • After-hours air conditioning and rate calculation. • Improved data sharing between tenant and landlord. • Waste minimisation (qualitative improvement measures). • Indoor air quality monitoring and outside air control. • A range of clauses in lease documents to facilitate more efficient operation of buildings.
Sites greater than 1,000m²	<ul style="list-style-type: none"> • Reduced area threshold for GLS from 2,000m² to 1,000m². • Increased NABERS energy targets and new water targets. • Waste minimisation plan. • Building electrification plan. • Green Star Performance certification.

Figure 11: Energy efficiency measures

Fleet transition and charging infrastructure

The Budget measure *Powering Australia – Commonwealth Fleet Leases* supports the government's commitment to achieve net zero emissions in the APS by 2030.

The Commonwealth Fleet Leases Measure includes a LEV target⁵ of 75% of new passenger vehicle purchases or leases by 2025 and will provide \$15.9 million to entities over 4 years from 2022–23. The measure will be delivered as a per vehicle lump sum payment, to contribute towards charging infrastructure. LEV are defined to include battery electric vehicles (BEV), plug-in hybrid vehicles (PHEV) and hydrogen fuel cell vehicles (FCEV).

We're mandated to use the whole of government fleet arrangement and are eligible for the per vehicle lump sum payment on delivery of a LEV which will be applied to associated charging infrastructure. The measure also

⁵ Targets are across whole of government and are not specific to entity.

requires vehicles acquired to be sold within 3 years to increase the supply of second-hand electric vehicles in Australia.

All future agency property leases will include a requirement for charging infrastructure, and this will be consistent with CNL updates to support charging infrastructure requirements.

Fleet transition

Action: 75% of fleet orders to LEV by 2025.

We'll transition existing fleet cars to electric vehicles in support of the LEV targets. Fleet Vehicle Control Officers analysed fleet-level data, including car usage to identify where the most need is, and 156 electric vehicles have been delivered across a number of our sites.

Electric vehicle charging infrastructure and approach to support fleet transition

Action: We'll install EV charging infrastructure (fleet cars only) at our sites to support fleet transition.

As at 30 June 2025, we have installed 26 EV chargers, with 13 sites currently installing and 72 sites in negotiations with the landlord.

This highlights the complexities we navigate with leased sites and there is no one-size-fits-all solution as landlords have different requirements and priorities for their property portfolios. Additionally, there might be other constraints such as insurance requirements and electrical upgrades that must be considered before charger installation can commence. This is evident in older buildings where electrical infrastructure is outdated and requires upgrades to cope with higher electrical demand.

Sustainable procurement

Action: We'll support the ESPP.

The Australian Government has committed to strengthen the environmental sustainability provisions in the Commonwealth Procurement Rules to drive demand for recycled content. Sustainable procurement also supports our commitment to net zero by 2030, a circular economy, the National Waste Policy and the Buy Australia Plan.

To support this, we're committed to support DCCEEW's ESPP (released May 2024). This policy allows us to integrate robust sustainable procurement information for staff and teams and refer to the relevant policy owners and their responsibilities.

Procurement of construction services over \$7.5 million: From 1 July 2024, we'll require tenderers to address and report against environmental sustainability through a Supplier Environmental Sustainability Plan (SESP). A SESP will be submitted by the supplier as part of their tender response. The SESP also includes specific reporting requirement.

Procurement of furniture, fittings and equipment over \$1 million: From 1 July 2025, there will be additional requirements for suppliers. The specifics and reporting requirements are in development by DCCEEW.

Sustainable procurement – what the agency will do

Support a circular economy	<ul style="list-style-type: none">Reuse, repair, refurbish and use of recycled content where possible. This is driven by our Sustainable Properties Policy and framework.
Minimise environmental impacts	<ul style="list-style-type: none">Improve water efficiency, minimise use of hazardous waste and materials.
Minimise climate change impacts	<ul style="list-style-type: none">Improve emissions reduction and energy efficiency. This will be driven by our Net Zero Action Plan and NZGO Policy.

Figure 12: Sustainable procurement – what the agency will do

Data centre transition

Action: We'll support NZGO through the Data Centre Panel and measures for data center providers to manage and reduce their greenhouse gas emissions.

In May 2023, the Digital Transformation Agency established a Data Centre Panel which incorporated strengthened measures for data centre providers to identify, manage and reduce their greenhouse gas emissions. Data centres must meet the following minimum requirements:

- Meet the requirements of the Government's ICT Sustainability Plan 1 for data centres.
- Comply with emission thresholds under the NGER Act.
- Use accredited Greenpower from renewable sources.
- Have a 5-star NABERS rating or equivalent environmental rating.
- Target a Power Use Efficiency (PUE) of less than 1.4.
- Have a roadmap to meet net zero emissions through innovation, planning and investment.

Our 2 data centres already meet these minimum standards.

Carbon offsets

Action: To be confirmed pending policy direction.

Carbon offsets may involve purchasing carbon credits to decrease or offset any remaining net emissions.

Finance is developing a whole of government Net Zero Offset Strategy and will articulate how offsets should be factored into future business decisions. They'll produce a tool to assist in making value for money assessments that incorporate the cost of offset requirements.

Additional initiatives

In addition to supporting meeting the targets for net zero emissions through NZGO, we'll undertake several additional initiatives to reduce emissions and strengthen and promote our position on environmental sustainability (Figure 13). These are not covered under NZGO but will assist in our emissions reduction pathway.

Initiative	Details
Commonwealth Climate Disclosure	<p>DCCEEW's Climate Risk and Opportunity Management Program (CROMP) provides guidance and support to enable Commonwealth entities and Commonwealth companies to identify, assess, prioritise and manage their climate risks and opportunities at an enterprise level.</p> <p>By 2026, climate risk and opportunity will be included in Australian public sector:</p> <ul style="list-style-type: none"> • decision-making processes • enterprise risk management • key corporate documentation. <p>Finance is continuing to provide support to entities to account for their greenhouse gas emissions and, for relevant entities, to meet their obligations under the APS net zero by 2030 target.</p> <p>We completed our first Commonwealth Climate Disclosure in the 2024–25 Annual Report. Due to the complexity of the agency's structure, a partial disclosure has been</p>

Initiative	Details
	<p>reported for 2024–25. Our strategy to manage climate-related risks and opportunities is developing and will mature as our understanding of how climate risks and opportunities impact at an enterprise level improves.</p> <p>Our future focus will be on building a capability uplift among key stakeholders to allow for a more mature disclosure for the future.</p> <p>Agency greenhouse gas emissions have been reported in our annual reports since 2023 and disclosed in this action plan. Emissions data in the annual report utilises the Emissions Reporting Framework methodology introduced by Finance across whole of government.</p>
Agency sustainability policy and framework	<p>The Environmental Sustainability Policy provides guidance to meet government and community expectations to reduce our environmental impact. The policy will support the decision-making in the agency necessary to meet sustainability requirements within legislative and policy obligations set by NZGO and net zero emissions by 2030.</p> <p>The policy outlines actions for staff to comply with government legislation and policy, as well as a pathway to improve energy efficiency, reducing and offsetting emissions.</p> <p>Key areas included in the policy are:</p> <ul style="list-style-type: none"> • energy and emissions • ICT equipment • waste • water • fleet and travel • procurement – to be considered in conjunction with ESPP.
Reducing landfill	<ul style="list-style-type: none"> • Promote our Waste Management Plan. • Increase availability of recycled bins and increase recycling footprint. • Commingled recycling will be negotiated into our contracts and leases. • Improved staff to bin ratios of at least 30 staff to one general waste bin and one commingled recycle bin has been introduced.
Communication	<p>A suite of communications has been developed to inform staff and delivered across the following platforms:</p> <ul style="list-style-type: none"> • Provision of information <ul style="list-style-type: none"> – promotion of net zero in News Hub – promotion of our Waste Management Plan and Environmental Sustainability Policy and framework – updated intranet pages, including a link to the environmental sustainability dashboard – posters to encourage positive waste management behaviour. • Presentation

Initiative	Details
	<ul style="list-style-type: none"> – Local presentations and education on net zero in an agency context.

Figure 12: Additional initiatives

Governance

Action: Regular and annual reporting of emissions and capability uplift across the agency.

We'll monitor and review our progress to net zero emissions and the implementation of this action plan. This will be supported by the following approaches to governance:

- Annual reporting to include emissions reductions.
- Reporting to include forecasts and regular analysis of emissions data.
- Appointment of an Agency Chief Sustainability Officer to oversee enterprise-wide governance.
- Agency representation at interdepartmental committee meetings at the Band 1 and 2 level, where a range of functions including property, fleet, travel, procurement and annual reporting are discussed.
- Capability uplift across the agency, supported by guidance and protocols developed by Finance to assist us to meet NZGO targets, including emissions reporting requirements and actions to reduce emissions.

Agency reporting and monitoring requirements

Action: Expand annual reporting to include refrigerants, solid waste, hire cars and accommodation during business travel.

The government's APS net zero by 2030 commitment requires entities to report greenhouse gas emissions on an annual basis to track progress to net zero emissions. Finance has developed an Emissions Reporting Framework to facilitate consistent public reporting of emissions by all entities in their annual report. This was implemented in our annual report in 2022–23 and has been expanded on in 24–25 to include emissions data from the following sources:

- natural gas
- electricity
- fleet
- flights
- refrigerants
- solid waste
- hire cars
- accommodation during business travel.

Emissions are calculated in line with APS Net Zero Emissions Reporting Framework, provided by Finance and consistent with the whole of government approach.

Staffing and resourcing

Action: Increase resourcing and environmental sustainability technical expertise in the agency.

There's a requirement for dedicated staff time and resources to manage and deliver aspects of the action plan:

- Increased technical expertise required to project manage the infrastructure upgrades and educate staff so they understand the impact of climate change and how they can help become carbon neutral.
- To support increased scope for building performance, this will result in higher volume of workload associated with NABERS assessments and GLS requirements.

Investment in net zero emissions

Achieving net zero in the APS by 2030 requires a financial investment by the agency. There are many ways funding can be sourced to support the mandates and targets, and these are outlined in this section.

Where upfront investment might be challenging for the agency, there are alternative funding opportunities available, such as low interest loans, PPAs or energy performance contracts (EPCs). While these options aren't currently promoted, they're being investigated and will be communicated as Finance develop a consistent approach for whole of government entities.

Investment in key actions will also be sourced from business-as-usual activities including whole of government renewable energy procurement and renewal or refurbishment of end-of-life infrastructure with more energy efficient solutions.

Alternative funding options

Renewable electricity – power purchase agreements

Finance is developing PPAs for entities to take up, which will reduce their emissions from electricity and streamline the procurement of electricity. These agreements allow entities to purchase lower emissions electricity or green power. These arrangements will expand those already established and managed by the Department of Defence.

Lease incentives

Action: We'll incorporate environmental sustainability upgrades into leases.

Sustainability initiatives identified for a site are requested as a lease incentive for the site (Figure 13).

During lease negotiations, we'll submit requests for:

- lighting and controls upgrades
- other upgrades such as EV chargers, solar PV systems and air conditioning upgrades.

Depending on the situation, this can be offered as additional works completed by the landlord, paid by the agency or as a part-financial contribution from the landlord to facilitate the opportunity.

Lease incentives	
Applicability	Any time a new or existing lease is being negotiated, or options are being exercised.
Benefits	Allows the initiative to be funded by the landlord and removes the up-front cost entirely.
Disadvantages	<p>Requires the agency be in a strong negotiating position to leverage the incentive.</p> <p>This generally means approaching the landlord well in advance of a pending lease negotiation, to leave open the possibility of us taking up a better offer.</p> <p>If we're in a poor negotiating position, the landlord might not agree to fund the initiative. It's important that the strategy for the site is known well in advance.</p>

Figure 13: Lease incentives

Energy performance contracts

Action: We'll use PPAs where possible.

EPCs are similar to equipment lease arrangements and PPAs as a third party needs to fund the investment capital required to deliver a project. However, instead of receiving a fixed rate or licence fee, EPC providers are paid out of the calculated savings they actually deliver, relative to an agreed savings target over a set period.

Finance have indicated through NZGO that this will be an option and we'll use PPAs where possible (Figure 14).

EPC overview	
Applicability	Similar to other third party-funded ventures, EPCs are best suited to owned premises, or those with long term lease prospects (10+ years). This allows sufficient time to distribute the ongoing repayments and realise the cost savings of the initiative.
Benefits	Cost savings and vendor reimbursement are calculated in line with the efficiency valuation organisation's prescribed methodology, using predetermined performance benchmarks and nominated external influences. Where actual performance is lower than the agreed savings target, the amount paid to the EPC provider is reduced accordingly. This approach reduces entity risk, as failure by the provider to deliver the promised savings results in lower payments.
Disadvantages	EPCs can create an administrative burden post completion. The energy savings must be calculated and verified and there's increased risk of contractual disputes if the actual energy savings are lower than expected.

Appendix A – NZGO targets and measures

Below are the NZGO targets and measures that have been set by Finance that the agency is required to achieve:

Target	Measure
Net zero energy	
By 1 January 2028, 80% of the Commonwealth's electricity consumption that's generated off-site and purchased by entities must be matched with renewable sources.	Percentage of electricity consumption generated offsite and purchased from renewable sources.
By 1 January 2030, 100% of the Commonwealth's electricity consumption that's generated off-site and purchased by entities must be matched with renewable sources.	Percentage of electricity generated on-site that's certified renewable energy.
Net zero buildings	
Office spaces leased since July 2026 that met the relevant NABERS rating.	Percentage of new office leases that achieved the relevant base building and tenancy NABERS energy rating.
Office spaces leased since July 2026 that achieves the relevant NABERS rating.	Percentage of office space meeting the relevant base building and tenancy NABERS energy rating.
New leased office space achieves relevant NABERS ratings.	Percentage of new office leases that achieved the relevant base building and tenancy NABERS energy rating.
Office spaces leased since July 2026 that achieve the relevant NABERS rating.	Percentage of office space meeting the relevant base building and tenancy NABERS energy Rating.
New owned office space achieves relevant NABERS ratings.	Percentage of office space purchased, constructed by or for the Commonwealth that: <ul style="list-style-type: none"> achieved a 6-star or higher NABERS energy rating is maintaining a 6-star or higher NABERS energy rating.
Office space fit outs and refurbishments achieve relevant NABERS ratings.	Percentage of office space fit outs or refurbishment valued over \$15 million that: <ul style="list-style-type: none"> achieved a 5.5-star or higher NABERS energy rating

Target	Measure
	<ul style="list-style-type: none"> • maintained a 5.5-star or higher NABERS energy rating.
Owned estate achieves relevant NABERS ratings.	Percentage of entity-owned office space that's rated 4.5-star or higher NABERS energy rating.
New office space achieves relevant Green Building Council of Australia (GBCA) Green Star rating.	Percentage of office space purchased, constructed by or for the Commonwealth, fitted out or refurbished with a value greater than \$15 million must obtain a GBCA Green Star Design and As Built rating of 4 using the net zero pathway or an approved rating from a similar industry rating framework.
New office space is electrified.	<p>Percentage of office space that's all-electric:</p> <ul style="list-style-type: none"> • purchased or constructed by or for the Commonwealth • leased by the Commonwealth.
Office spaces leased since July 2026 that met the relevant NABERS rating.	Percentage of new office leases that achieved the relevant base building and tenancy NABERS energy rating.
Net zero procurement	
Develop the scope 3 cost modelling assessment and work with agencies in its development.	Outcomes to be published showing categories to tailored emissions reduction efforts.
Develop an ESPP.	Successful delivery of the ESPP.
Net zero fleet	
25% of new passenger (including 'sports utility') vehicle orders to be low emission vehicles (LEVs) in 2022–23.	Reporting outside of this strategy - progress against the target is published on Finance's website.
50% of new passenger (including 'sports utility') vehicle orders to be LEVs in 2023–24.	Reporting outside of this strategy - progress against the target is published on Finance's website.
75% of new passenger (including 'sports utility') vehicle orders to be LEVs by 2025.	Reporting outside of this strategy - progress against the target is published on Finance's website.
Net zero travel	

Target	Measure
Increased uptake and usage of the NABERS Energy tool within accommodation providers.	Number of providers within the travel booking system that disclose a NABERS energy rating.
Net zero information and communication technology	
Improved access to greenhouse gas reporting through increased usage of the NABERS Data Centre rating tool.	Increase in suppliers who're utilising the NABERS based rating on a baseline of January 2024 and measured against July 2026.
Emissions reduction plans	
By 30 June 2024, portfolios and their entities must develop a long-term emissions reduction plan. Provide an annual progress report towards 2030 targets.	Percentage of emissions reduction plans developed (2024). Percentage of overall emissions reduction per entity since FY 22/23 baseline.
People and culture	
Capability uplift across the APS.	Initially will report on participation rates and details on the number sessions and activities held.

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