



# National Adaptation Plan Issues Paper

Submission by The Environment Institute of Australia and New Zealand (EIANZ)



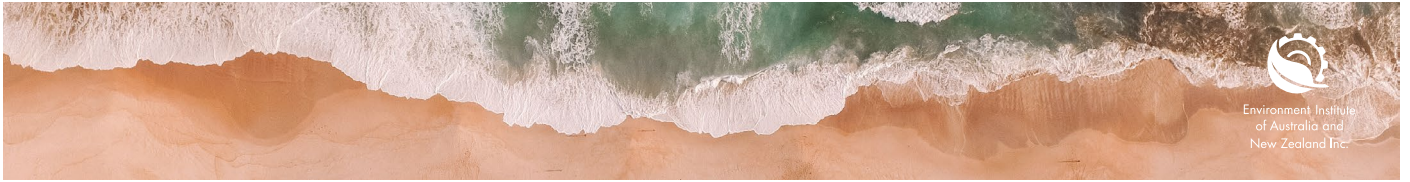
## About EIANZ

The Environment Institute of Australia and New Zealand (EIANZ) is the peak body for environmental professionals in Australia and Aotearoa New Zealand. Our membership spans a diverse range of technical professions including scientists, policy makers, engineers, lawyers and economists. We advocate for environmental knowledge and evidence-based practice and set high ethical standards for environmental practitioners through our Code of Ethics and Professional Conduct.

EIANZ's Climate Change Special Interest Section prepared the following submission in response to the Department of Climate Change, Energy, the Environment and Water's (the Department's) National Adaptation Plan (NAP) – Issues Paper, March 2024. The submission brings together expert opinions of Certified Environmental Practitioners with extensive experience in climate change-related fields.

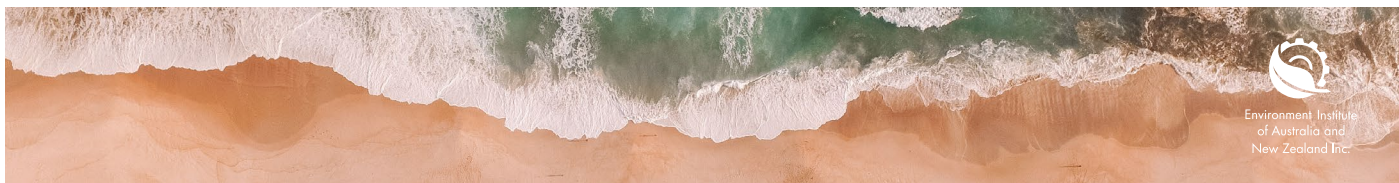
## General Comments

1. EIANZ commends the Department for giving attention to climate change adaptation. We recommend rapid implementation of effective adaptation actions, to be prioritised according to risk assessments and with resourcing commensurate to the scale (and potential financial cost) of the risks. EIANZ would be disappointed to see time and money spent on consultation and report preparation that does not result in significant improvements to Australia's resilience to climate change.
2. To ensure real improvements, EIANZ strongly recommends the Department review the [National Climate Resilience and Adaptation Strategy 2021–25](#) and the achievements of the Council of Australian Governments (COAG) Select Council on Climate Change. The Select Council and the Strategy had objectives consistent with the proposed NAP and a review of the achievements and challenges will provide insights that make the NAP more effective and easier to implement. It will also mean that we avoid 'reinventing the wheel' and repeating mistakes of the past.
3. The Issues Paper does not adequately convey the urgency of action to adapt to climate change. Instead, it pursues a more leisurely pace, as demonstrated by the reference to changes to the National Construction Code, which is notoriously slow to change. The Paper also fails to recognise the changes, impacts and societal effects which are already occurring.
4. The Issues Paper aspires to make adaptation 'mainstream' and notes that this requires a fundamental shift. The achievement of mainstreaming appears to be the ultimate goal of the National Climate Adaptation and Risk Program, of which the NAP is an element. However, 'mainstreaming' is not actually defined or described in the Issues Paper. EIANZ recommends the provision of a clear definition of 'mainstreaming' and a clear description of what Australia would be like when adaptation had been successfully mainstreamed. The nature of the shift required to achieve mainstreaming also needs to be described, along with the intended approach to creating the shift.
5. The Issues Paper talks about 'driving' adaptation to climate change into business as usual, for corporations and all levels of government. This suggests a reliance on power to force organisations to take action and would require the Commonwealth to have powers similar to those it deployed in response to World War II. Those powers were unprecedented at that time and are unlikely to be accepted by the contemporary public. EIANZ instead recommends an approach to adaptation



based on commitment and accountability. Individual organisations and governments at all levels should commit to specific adaptation measures and be held to account for the commitments they make.

6. EIANZ strongly supports embedding First Nations perspectives, priorities and experiences into the National Climate Risk Assessment and the National Adaptation Plan.
7. Some important aspects of adaptation do not receive sufficient attention in the Issues Paper. These include:
  - Population growth (which contributes to climate change and increases the challenge of adaptation), including the impact it has on crucial life support resources such as water.
  - Biodiversity and ecology (such as the adequacy of existing reserves, shrinking of climactic zones, migration of species and management of invasive species).
  - Skill sets needed in the future. These include capability within government (particularly planning), as well as trades, and will require substantial investment in the post-school sector by both government and business.
  - Research required to build knowledge to inform effective adaptation.
8. If local governments are to be a significant contributor to adaptation, the Commonwealth Government must provide them with greater support in terms of both capability and funding. The [NSW DCCEEW Local Government Climate Change Survey of 2023](#) showed that approximately two-thirds of local governments have included some adaptation and mitigation into their strategic plans, but in general, this has not been carried through to the local environmental plans or planning policies. This demonstrates a clear disconnect between strategic planning and on-ground climate-adaptive action.
9. The survey also identified barriers to adaptation including a lack of assigned funding; lack of staff (particularly in rural and remote areas); lack of capability; inconsistencies between State and Federal requirements and support; and uncertainty surrounding the role of Local Government in relation to climate change. These barriers need to be addressed to enable Local Governments to fulfil their responsibilities in relation to adaptation.
10. EIANZ recommends more rapid action on the National Climate Risk Assessment so that the NAP can be appropriately informed.
11. It is of paramount importance that the Australian community is engaged with the development and implementation of the NAP, because any attempt to impose adaptation actions upon the community will fail if the people affected have not been involved.



## Responses to consultation questions

### Foundations for a National Adaptation Plan

**Q: What do you think a well-adapted and resilient Australia looks like? Does the draft vision capture this? Why, why not? Do you agree with the key objectives of the plan? What other suggestions do you have?**

#### *Vision*

A well-adapted and resilient Australia:

- Provides healthy environments for all native species.
- Enables all citizens and residents, including First Peoples, to practice their culture and spiritual beliefs.
- Houses all of its citizens and residents in homes that are safe and healthy.
- Protects its citizens from extreme heat at home and in transit.
- Has infrastructure that continues to function normally during extreme heat, storms, cyclones, fire and floods.
- Has a national insurance scheme that is equitable, proportionate to the risks presented and effective in timely response to claims.

Unfortunately, the draft vision does not capture these outcomes. In fact, the draft vision does not actually create any picture. It is a broad statement that captures everything, promises nothing, and suggests a lack of vision and urgency.

The NAP should present a clear description of Australia in 2050 as a climate-adapted and resilient society, environment and economy. When that is established, the actions required to achieve that state can be identified and scheduled to create a plan.

#### *Objectives*

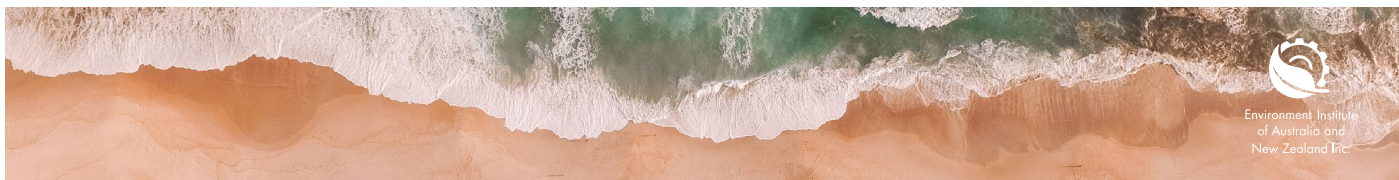
The objectives appear to be focused on actions needed to be taken to facilitate adaptation, rather than the desired outcomes. At this stage, particularly in the absence of a comprehensive risk assessment, it is impossible to know if the actions identified will deliver the required outcomes. If the objectives could be stated as outcomes, the processes for achieving those outcomes could change over time as our knowledge regarding effective action develops.

The objectives of the National Adaptation Plan should be to achieve particular outcomes relating to the 11 identified second pass risks.

#### *EIANZ's Suggested Objectives*

The National Adaptation Plan will:

1. Describe outcomes to be achieved in relation to adapting to priority climate-related risks.
2. Describe actions to be taken to achieve those outcomes, progress milestones and completion timeframes.
3. Identify parties responsible for described actions and gain their commitment to implementing actions.
4. Deliver real and substantial outcomes for Australians living with climate change, across 5, 10 and 50-year time horizons.
5. Deliver on Australia's commitments under the Paris Agreement, to adapt to climate change by enhancing adaptive capacity, strengthening resilience, and reducing vulnerability to climate change.



**Q: The plan will respond to the priority nationally significant risks identified in the National Climate Risk Assessment. Within those, what areas should be the Commonwealth's priority for this National Adaptation Plan and why?**

We have not seen evidence of a robust approach to determination of the priority risks, however, they are broad enough to cover most of Australia's adaptation requirements. The most important thing is that we start credible, impactful work to address the known significant impacts.

Priorities should include:

1. Providing for resettlement of Pacific Island populations where whole communities are being inundated by rising sea levels. This is underplayed in the Issues Paper. Resettlement is happening now and will only increase over time.
2. Building infrastructure to enable populations in vulnerable regions to move to areas less likely to be impacted by rising sea levels, floods, heatwaves and bushfires. Some parts of regional Australia can be expected to become unlivable due to sustained elevated heat. We need to start planning for this now.
3. Addressing the existing housing shortage and rental standards to reduce fatalities from extreme heat events and improve our capacity to provide homes for people displaced by the expected floods and bushfires. A raft of policy changes is needed to ensure people can access housing appropriate to their needs and income levels. The NAP is not the place to spell these out, but it does need to recognise that removing people from housing stress will contribute to a population more resilient to climate change.
4. Providing for future food production in terms of appropriate land, rainfall and financial structures. This should include investment in new plant and animal varieties that are fit for purpose in a changing climate. Producers should be supported to relocate where necessary. For example, wine companies have been establishing new vineyards in cooler climate regions like Tasmania for almost a decade.
5. Providing transport and appropriately located work for sub-urban communities for the time when fossil fuels become prohibitively expensive. Australia only has about 3 weeks of supply of liquid transport fuels in the event of a major trade disruption. Weaning our transport off fossil fuels as much as possible not only makes climate sense but also would make Australia far less vulnerable to disruption by a major international event (e.g. war in the South China Sea).

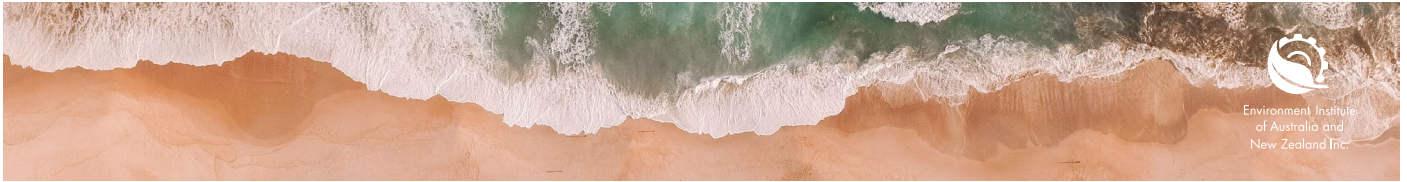
**Q: What is working well in adaptation policy governance at the national level? Are there more opportunities for collaboration, or institutional changes that will help build a more adapted Australia?**

Australia's response to COVID was quite good – although not perfect, it is widely recognised that we did a lot better than most countries. We should look to the COVID experience for insights to improve governance in relation to climate change.

We should be wary of creating more agencies to deal with specific issues. While there may be a case for creating new bodies, priority should be given to strengthening the expertise and capacity of existing institutions.

**Q: How should adaptation success be measured?**

1. Pacific Islander resettlement plans agreed by key stakeholders.
2. Plan for future food production agreed by key stakeholders.
3. Quantity of power, water and sewer infrastructure in low-risk areas.
4. House price: salary ratio.
5. Increased public transport in terms of numbers of trains, trams and buses, and in terms of access. Regional transport needs to be less dependent on fossil fuels and more efficient in fuel use, whether diversion onto rail or electrifying road transport. As a case study, the Commonwealth should



undertake a review of the Inland Rail from planning to construction to identify how climate risks were built into the process.

6. Proportion of insurance claims paid and time elapsed between claim and payout.

**Q: What time horizon should the National Adaptation Plan cover?**

Short, medium, and long term (5, 15 and 50 years), with greater detail for short and medium term.

**Q: Do you support the draft principles for prioritising and sequencing adaptation actions over time? Why or why not? Are there any gaps?**

The draft principles fail to recognise the urgency of action to adapt to climate change. The highest priority should be to address the significant impacts that are already occurring, such as homelessness caused by major floods. The second priority should be to reduce the magnitude of significant impacts expected with high levels of certainty.

## **Systems sections**

**Q: What measurement and evaluative tools and processes should be implemented to track adaptation progress for this system?**

EIANZ recommends an annual performance report to the Australian Parliament and people on implementation of the NAP.