



8 June 2012

Barriers to Effective Climate Change Adaptation
Productivity Commission
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PO Box 146
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Dear Sir/Madam,

RE: SUBMISSION TO THE PRODUCTIVITY COMMISSION DRAFT REPORT BARRIERS TO EFFECTIVE CLIMATE CHANGE ADAPTATION

Regional Development Australia – Northern Rivers (RDA – Northern Rivers) welcomes the opportunity to make a submission to the Productivity Commission Draft Report *Barriers to Effective Climate Change Adaptation*.

Our organisation is a non-profit community-based and regionally focused organisation that connects people and businesses in our region to opportunities through partnerships focusing on community, environment and economy. RDA – Northern Rivers is encouraged by the Australian Government's support of the Productivity Commission to advance climate change adaptation reforms.

RDA–Northern Rivers provides a conduit between governments and our regional communities. We enable our communities to inform governments about the strengths and weaknesses of our region and:

- improve community engagement;
- contribute to regional planning;
- enhance whole – government approach;
- increase awareness of government programmes;
- enhance community and economic development.

RDA – Northern Rivers has recognised that no one organisation has the mandate or resources to deal with all of the interrelated complexities involved in responding to climate change. Within the Northern Rivers, a collaboration of 26 peak organisations has been established. Known as Sustain Northern Rivers (SNR), the partner organisations (Attachment 1) are committed to communicate, consult and collaborate for action on climate change. The membership includes Councils, State Government Departments, University and TAFE and community organisations, including youth and natural resource agencies in the region.

SNR has developed a collaborative model based on distributed leadership as an effective way to build the region's resilience to climate change with the understanding that the complex future cannot be faced with a 'business as usual' approach and having a long term goal that requires re-thinking the way we live, use resources, govern and do business. The members have developed a



Regional Transitional Model for a Low Carbon Future to inform their work, and seek the support from all levels of Government to implement this Model Action Plan.

The following comments address some issues within the draft recommendations of the *Barriers to Effective Climate Change Adaptation* report relative to the Northern Rivers region of NSW and to the work which has been undertaken by RDA – Northern Rivers and Sustain Northern Rivers (SNR).

4.1 Assessing Reforms and Setting Priorities

The approach to assess reform priorities stated in the report is to firstly define the problem. Defining the nature of the problem can become a reason for inaction. Uncertainty and not taking account of scientific assessments and projections of future risks should not be a reason to avoid decision-making and determining policy reforms.

The recommendation needs to ensure a staged approach do determining implementation of reforms. The case to defer action, especially for high cost adaptation options, until better information is available as the recommendation suggests, may not always be the best option. The locations of key community facilities or infrastructure highlight the risks with the deferral approach. For example, although some of the reasons to maintain the location of Cairns Hospital within an inundation area may have been more acceptable to the community at the time, the recent need to evacuate the hospital during a natural disaster highlights the need for longer term decision making. The need for case by case analyses before drawing conclusions should be included in this recommendation.

RECOMMENDATION:

RDA –Northern Rivers recommends a staged approach to determining the implementation of policy reforms for projects with high up-front costs even if the projected climate change impacts are uncertain.

5.1 Building Adaptive Capacity

The work undertaken by RDA-Northern Rivers and SNR has shown that the will to be innovative is often stifled by the economics of doing so. The *Doing Green Business: barriers and solutions for the Northern Rivers Project Report*¹ has identified that the most significant barrier for 46.4% of green/environmental businesses is lack of financing or financial risk followed by access to markets.

SNR recognised the need to build adaptive capacity and SNR's approach has been to link already highly-networked partner organisations to create a network-of-networks celebrating and utilising the diversity and connectivity to enhance resilience and to encourage new adaptive responses. A major barrier to adapting to climate change is centered on the gaps that are formed by individual organisations and the constrained responsibilities of large agencies. A key result of this collaboration has been the capacity for all member organisations to communicate openly with each other, share resourcing and funding opportunities to respond to regional climate change issues.

RECOMMENDATION:

RDA – Northern Rivers recommends embedding collaborative activity in planning for adaptation to build strong networks across agencies and organisations to break down barriers and to build inter-organisational/inter-agency resilience and adaptive capacity.

¹ Regional Development Australia - Northern Rivers. 2012. *Doing Green Business: barriers and solutions for the Northern Rivers: Northern Rivers Green Business Project 2012.*

6.1 Information Provision

Finding the balance between adequate provision of information whilst managing the fear associated with new information that can impact markets and the economic viability of businesses requires serious consideration.

The provision of regional climate information is particularly important for RDA's, Governments and service providers to undertake and inform their work. Providing easily accessible and concise information is essential. The suggested repository would have merit given that not all knowledge gained is purely research. As an example, Local Governments gather a lot of information as part of their operations which would be a valuable resource. This information is not centrally collected but could be provided to an agency to manage and disseminate. The Commonwealth Government needs to play a key role in researching, disseminating and capturing information on climate change to ensure all information can be shared at a regional and local level. Having a central and moderated body for emerging information and research would give confidence that such information is valid.

The provision of better information to communities would help communities adapt to climate change and to develop resilience. The completion of high risk/vulnerability assessments for local councils would contribute to scientific knowledge and increase community understanding of climate change impacts.

Significant work has already been done that indicates legal liability cannot be fully removed and a duty of care must be exercised in decision-making. This reinforces the need for best available information to be readily accessible. RDA – Northern Rivers supports the Draft Recommendation and encourages the Commonwealth Government to ensure that information can be used at a local level in addressing and mitigating legal risks.

RECOMMENDATION:

RDA –Northern Rivers recommends that:

- *an agency or repository be established to ensure the collection, dissemination and validation of a variety of climate change research and information; and*
- *Councils are supported to complete high risk/vulnerability assessments for all risk areas (e.g. for bushfire, flood, coastal erosion and other natural disasters).*

7.1; 7.2 Local Government

The uncertainty surrounding the roles and responsibilities of local government and in particular the legal risks can encourage unplanned and ad hoc approaches to the complexity of climate change issues. Legislation and science is changing and there are limited resources (finance and staff) for local government to respond to this uncertainty. Clarifying liability and responsibilities by State Governments needs to be done in consultation with the appropriate Local Government representation to ensure the adequate distribution of these responsibilities and liabilities across all levels of government.

Local Government needs guidance and specifications to drive climate change adaptation, especially for existing settlements, as presently, many aspects are ill-defined under planning legislation and in particular coastal policy. As the seven local governments within this region are members of SNR, this signifies that these Councils recognise the need to approach climate change in an innovative and collaborative way.

RECOMMENDATION:

RDA –Northern Rivers recommends that:

- *clearly defined roles and responsibilities be developed for Local Government in collaboration with relevant Local Government representation*

8.1 Planning and Building Regulation

RDA-Northern Rivers applauds the suggestion that public funding be invested to up-date the Building Code and Australian Standards to incorporate climate change adaption.

Clarence Valley Council has adopted a climate change risk management approach to incorporating these risks into planning decisions. West Yamba development is an example of this approach which involved considerable community input over an extended period and examined costs and benefits of developing in an 'at risk' area with regard to future climate change impacts. In this instance, Council adopted a precautionary approach requiring land filling to manage inundation risk.

The potential barriers to adapting to climate change often relate to regulations. The planning and building regulations will need ongoing review as new policy and innovations are developed. Regulatory impacts may directly stifle an adaptation solution, particularly for new technologies or techniques related to products or standards whilst at the same time, regulation on products or standards can force adaptation by the market. Regulations are slow to change and applications where innovative technology or approaches depart from the sanctioned regulations need an adaptive body to oversee/approve these special cases to expedite activity. Local Government or other approval bodies may not always have the capacity to rapidly approve these unique cases but an impartial reference group or advisory body could provide support by being a conduit for information whilst being seen as a credible voice.

RECOMMENDATION:

RDA –Northern Rivers recommends that:

- *amendments to the Building Code and Australian Standards are publicly funded and that a neutral body is established to enable the express endorsement of innovative approaches to adapting to climate change which do not fit within the current regulation; and*
- *funding options are identified to support Councils to 'flood proof' as much as feasible against future damage.*

10.1 Emergency Management

The clarification of roles and responsibilities for those involved in emergency management, and appointing a state emergency controller accountable for major emergencies, whilst ensuring the sharing of responsibility for hazard preparedness is commended. Natural disasters have no respect for state borders so it is imperative that cross border communications are highly developed. It is also important to recognise that volunteers need to be within the sphere of communication. Preparation and response to climate related natural disasters, such as fire, flood and tropical cyclones, are a high priority for the Northern Rivers.

Natural Disaster Relief funding is provided for repairs and to maintain the status quo in terms of asset condition. Unfortunately these funds do not flood proof infrastructure against future floods, with the result that often the same or similar repairs are again required after subsequent floods.

RECOMMENDATION:

RDA –Northern Rivers commends a state emergency controller accountable for major emergencies whilst recognising the need for highly developed cross border communications.

13.1 Reform Priorities

Given that the Northern Rivers Regional Plan² has a strong focus on climate change, RDA – Northern Rivers has endorsed its support for the following as key priorities in addressing coastal management reform issues:

1. the National Sea Change Taskforce recommendations to the Productivity Commission Inquiry;
2. the National Sea Change Taskforce Discussion Paper *Draft Coastal Sustainability Charter and Policy Framework for Coastal Australia*; and
3. the call to establish a National Coastal Commission to have responsibility in regard to the coastal issues facing Australia.

Due to the complexity of climate change, the Australian Government could promote cooperation across jurisdictions and fund climate change adaptation initiatives across a number of areas which may lead to greater efficiencies and effectiveness. The report deals with a broader integration nationally of emergency management, however, the Australian Government could play a key role in coordinating adaptive measures across the other areas such as regulation and information.

RECOMMENDATION:

RDA –Northern Rivers recommends greater cross-border integration especially for coastal management.

Conclusion

RDA – Northern Rivers appreciates the opportunity to contribute to the Productivity Commission's Draft Report.

Regards,

Katrina Luckie
CEO

² Regional Development Australia - Northern Rivers. 2011. *Northern Rivers Regional Plan 2011, vision to 2020.*



Sustain Northern Rivers

An Initiative of the Northern Rivers Climate Change Collaboration

Attachment 1: *Sustain Northern Rivers* member organisations

1. ACE community Colleges
2. Ballina Shire Council
3. Byron Shire Council
4. Byron Region Community College
5. Clarence Valley Council
6. EnviTE Inc
7. Kyogle Shire Council
8. Lismore City Council
9. Local Community Services Association
10. North Coast TAFE
11. North East Waste Forum
12. Northern NSW Local Health District
13. Northern Rivers Catchment Management Authority
14. Northern Rivers Social Development Council
15. Northern Star Pty Ltd
16. Northern Rivers Tourism Inc
17. Northern Rivers Youth Advisory Council
18. NSW Department of Education and Communities
19. NSW Department of Primary Industries
20. NSW Department of Trade and Investment, Regional Infrastructure and Services
21. Regional Development Australia-Northern Rivers
22. Richmond Valley Council
23. Southern Cross University
24. Tweed Shire Council
25. University Centre for Rural Health-North Coast
26. Youth Environment Society