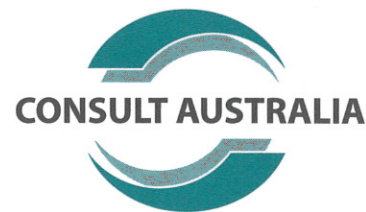


**NATIONAL OFFICE**

Level 6, 50 Clarence Street  
Sydney NSW 2000  
GPO Box 56  
Sydney NSW 2001

**T.** 02 9922 4711 **F.** 02 9957 2484  
**E.** [info@consultaaustralia.com.au](mailto:info@consultaaustralia.com.au)  
**W.** [www.consultaaustralia.com.au](http://www.consultaaustralia.com.au)  
**ABN.** 25 064 052 615



Driving Business Success for Consulting Firms in the Built and Natural Environment

25 June 2012

**Dr Wendy Craik**  
**Presiding Commissioner**  
Productivity Commission  
Barriers to Climate Change Adaptation Inquiry  
Locked Bag 2 Collins Street East  
Melbourne VIC 8003

Dear Dr Craik,

**Re: Barriers to Climate Change Adaptation Inquiry**

I am pleased to provide this response to the Productivity Commission's Draft Report as part of the Barriers to Climate Change Adaptation Inquiry. This second submission from Consult Australia follows our more detailed response to the Commission submitted in January this year.

Consult Australia is the association for professional services firms within the built and natural environment; influencing policy, creating value and promoting excellence. Our member firm services include, but are not limited to: design; architecture; technology; engineering; planning; landscape architecture; surveying; cost consulting; project management; and management solutions. We represent some of the industry's biggest players in this space with our member firms collectively employing more than 61,000 staff.

As previously indicated, Consult Australia is a proud member of the Australian Sustainable Built Environment Council (ASBEC), and is pleased to be part of their Climate Change Task Group (CCTG). The CCTG is currently finalising *A climate change adaptation framework for the built environment* for release later this month. This Framework and the supporting report will provide a critical point of reference for the Commission as you consider how best to progress your Inquiry.

In the interim, I am pleased to offer some further initial comments in relation to the Draft Report. For Consult Australia, adaptation of our built environment is a particular challenge faced by community, governments and industry across Australia.

In reviewing the Productivity Commission's Draft Report, Consult Australia is concerned that the Commission understates the case for action to adapt our built environment in response to forecast climate change. The Commission writes of the need for new approaches to manage climate change risks to the built environment:



*Addressing climate change risks for existing areas of human settlement requires consideration of whether, how and when governments should 'protect' cities or towns, or relocate communities from high-hazard risk areas. Currently, there is no well-established policy response to this issue.<sup>1</sup>*

The lack of government policy to manage the adaptation of our built environment has long been identified by Consult Australia, and is alarming.

The Productivity Commission fails to elaborate on the significance of this issue in the *Draft Report*. The current absence of policy as identified, fails to inform any of the Commission's early draft recommendations. The Commission suggests only that:

*It may be necessary to develop national approaches or principles to support strategic management of climate change risks for existing settlements.<sup>2</sup>*

That this issue is not more strongly expressed and substantiated by the available evidence, nor included within the Commission's draft recommendations is of great concern. Given the importance of the built environment and the benefits of early adaptation action, this is a gross understatement of the need for clear and coordinated adaptation policy responding to climate change across the built environment.

In contrast, the report commissioned by the Australian Government Department of Climate Change and Energy Efficiency from Maddocks is clear:

*The challenge that climate change presents for Australia's infrastructure and associated services cannot be overstated. There is a risk that existing regulatory frameworks might 'lock in' maladaptive action, which could compromise the short, medium and long-term resilience of our infrastructure. A new approach is needed to ensure that effective responses to climate change are embedded in relevant regulatory frameworks so that our infrastructure and associated services are resilient to climate change as we move into the future.<sup>3</sup>*

Consult Australia urges you to consider more detailed recommendations for action to facilitate built environment adaptation consistent with the recommendations to be proposed in the *ASBEC Climate change adaptation framework for the built environment*.

We look forward to further discussions with the Productivity Commission in 2012, both regarding to the specific issues raised here, and those broader issues and recommendations identified through the thought leadership created by ASBEC.

Yours sincerely,

**Megan Motto**  
Chief Executive

---

<sup>1</sup> Productivity Commission. April 2012. *Barriers to Climate Change Adaptation Draft Report*. Page 17

<sup>2</sup> Ibid. Page 17

<sup>3</sup> Maddocks for the Australian Government Department of Climate Change and Energy Efficiency. 2011. *The role of regulation in facilitating or constraining adaptation to climate change for Australian infrastructure*. Page xiv