

16 December 2011

Productivity Commission
LB2 Collins Street East
Melbourne Vic 8003

Email: climate-adaptation@pc.gov.au

Attention Ms. Yvette Goss

Dear Ms Goss,

Re: Submission to the Inquiry into Barriers to Effective Climate Change Adaptation

Thank you for providing Surf Life Saving Australia with the opportunity to respond to this Inquiry.

Surf Life Saving Australia (SLSA) is Australia's major water safety, drowning prevention and rescue authority. We are the largest volunteer organisation of our kind in the country. Our core activities are:

- Coastal safety and lifesaving
- Education and Training
- Fitness and sport
- Junior & Youth Development
- Member and organisational development

SLSA is the peak body for over 330 surf life saving clubs, regional and states centres throughout the country with the primary mission of saving lives in the water, and operates across local, state and national jurisdictions. The continued operational viability of all of these entities is essential to providing a seamless lifesaving operation protecting the more than 100 million annual visitations to our beaches around the country.

SLSA commends the government and the Productivity Commission for introducing this Inquiry. Surf Life Saving is at the frontline of the impacts of extreme weather events and climate change with a significant majority of its services and assets in the coastal zone and at the mercy of the elements.

In the following, we have responded to the Inquiry's terms of reference in assessing the regulatory and policy barriers to effective climate change adaptation and identifying any specific barriers that may inhibit effective adaption.

In particular, SLSA has responded against each of the four broad categories of:

1. Market failures – occur when markets do not allocate goods and services in a way that maximises the overall welfare of the community.

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2. Regulatory barriers – result from government policies or regulations that increase costs, create delays or inhibit activities.
3. Behavioural and cultural barriers – result from constraints on the decision-making abilities of individuals, and may arise, for example, due to cognitive factors or cultural values.
4. Organisational barriers – are constraints on the decision-making abilities of organisations, including large firms and government agencies.

I trust that our feedback to the review will assist you in determining the best outcome for the Australian community and the organisations that serve it, including SLSA.

Yours sincerely,

Brett Williamson OAM
Chief Executive Officer
Surf Life Saving Australia

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Surf Life Saving Australia Submission to the Inquiry into Barriers to Effective Climate Change Adaptation

Around 85% of Australia's population live within 50km of the coastline¹, and a quarter of all Australians live within three kilometres of the coast². This places significant pressure on these fragile environments. A booming property market, a healthy tourism industry and Australians desire to live by the sea have resulted in a large influx of residents, both permanent and part-time to coastal shires².

The coastal zone of Australia is likely to experience significant impacts as a result of climate change in the course of this century, even if the efforts expected from the international community to stabilise atmospheric greenhouse gas concentrations eventuate. In particular, climate change presents a critical challenge for organisations whose operations are focused largely in the coastal zone. Surf Life Saving Australia (SLSA) is one such organisation, whose focus is on patrolling Australia's beaches and providing rescue services to beach users.

Surf Life Saving Australia has estimated there are more than 100 million annual visitations to our beaches and has identified the need for effective adaptation as vital in ensuring the safe use of the beaches continues.

For more than 100 years surf lifesavers and surf lifesaving clubs have been adapting to their changing coastal environment and the impacts of periodic storm events. However, in recent years the impacts have grown in number and complexity and not solely environmentally.

In October 2011, and following 18 months of investigation, SLSA released a Report titled *'Impacts of Extreme Weather Events and Climate Change on Surf Life Saving Services: A Road Map for Adaptive Action'*³ completed by consultants Coastal Zone Management (Australia) P/L from Perth Western Australia. The Report, which includes a Climate Change Adaptation Road Map to assist SLSA in the proactive management of project climate change impacts, had the objective to understand the range of risks posed by climate change, review available strategies to address the identified risks and develop a program of works to implement the identified strategies.

A copy of the Report is provided with this submission.

The Report identified more than 63%³ of surf lifesaving clubs are located on zones of potential instability¹; that is those areas that are susceptible to erosion. There have been a number of clubs severely damaged by storm events over the past two years, including the Moore Park Surf Life Saving north of Bundaberg in Queensland as depicted in the following photograph.

¹ Geoscience Australia

² Coastal Survey Report, ALGA 2005

³ Elrick, C., Dalton, L. and Kay, R.C. 2011. *Impact of Extreme Weather Events and Climate Change on Surf Life Saving Services: A Road Map for Adaptive Action*, report prepared for Surf Life Saving Australia



Damage to Moore Park SLSC, Bundaberg, Queensland – Photo Courtesy Moore Park SLSC

The recommendations of the Report can be summarised as follows.

Build capacity to respond to the impacts of climate change by raising awareness, enhancing partnerships and mainstreaming climate change adaptation.

- Strengthen partnerships with organisations to share and access information that supports coastal management and climate change adaptation.
- Enhance communication across the organisation through development of a communication plan.
- Enhance clubs access to information that will raise awareness by publishing information on readily accessible locations, such as the EcoSurf website
- Promote on-ground adaptive action by identifying case studies of good practice, such as management actions to reduce the impacts of extreme events or long term chronic beach change.
- Mainstream climate change into operational procedures to facilitate integrated management of climate risks.
- Undertake awareness raising activities to enhance organisational commitment to addressing the impacts of climate change.

Enhance the capacity of SLS clubs and support services to understand and assess their climate change risks and provide an equitable means to allocate resources to address the identified risks.

- Assess the vulnerability of SLS clubs to climate changes (through completion of a first pass vulnerability assessment) to: (i) understand differential exposure and capacity; and (ii) provide case for financial support to aid adaptation.
- Establish mechanisms to monitor the impacts of climate change and other risks across the organisation (i.e. a climate risk reporting framework).

Provide financial support to SLS clubs, support services and branches to adaptively manage climate change and extreme events.

- Identify funding sources to provide dedicated financial support for adaptive action and establish criteria for equitable dispersal of funding.

Provide coordinated support mechanisms to clubs and support services to access both in times of emergency and to support long-term planning, contributing to (i) a coordinated response to business continuity following extreme events; and (ii) targeted guidance and direction to clubs and support services based on an understanding of current capability.

- Investigate opportunities to establish coordinated support systems for clubs to access in times of emergency and to support long-term planning.
- Assess the adaptive capacity of SLS clubs to facilitate the delivery of targeted support based on individual needs.

The Report also summarises that “the adaptive actions will enable SLISA to achieve proactive and coordinated management of long-term changes in mean and extreme weather events across the organisation.

RECOMMENDATIONS TO BARRIERS TO EFFECTIVE CLIMATE CHANGE ADAPTATION

Market failures – occur when markets do not allocate goods and services in a way that maximises the overall welfare of the community.

Consistent interpretation of the information that leads to the development of policy, legislation and regulations is vital for any organisation that operates across jurisdictional borders such as local government or State boundaries.

Surf life saving facilities, by the very nature of the primary service they provide, occupy land that is the responsibility of the three levels of government in Australia, although most are under the jurisdiction of the local government authorities (LGAs, or Councils). Of the 560 local government bodies in Australia, approximately 220 (39%) are categorised as coastal.

It appears the Commonwealth Government is facilitating a number of initiatives which appear to be providing some guidance to other governments and to the Australian community on coastal planning and management in response to the impacts of climate change.

Further, and while there has been considerable debate for a coordinated national approach to climate change adaptation, there remains much to do in providing an environment where there is consistent interpretation of the climate change science and to the consequential policies, legislation and regulations.

The Technical Report: Government Coastal Planning Responses to Rising Sea Levels (Good, M., 2011)⁴ highlights the differences including the different sea-level rise planning benchmarks; excluding the local variations as outlined in the science.

Recommendation 1

A national coordinated approach for the consistent interpretation of climate change science and associated guidance within Australia will lead to improved policy and legislation in response to the impacts of climate change.

Regulatory barriers – result from government policies or regulations that increase costs, create delays or inhibit activities

As mentioned previously, there are approximately 330 surf lifesaving facilities in the coastal zone and across many local government authorities (LGA). Due to the introduction of State coastal policies and LGA planning laws, surf life saving clubs (SLS) in a number of municipalities are now required to have a coastal vulnerability assessment completed for any change to their facilities, no matter how minor or significant.

The associated impacts on clubs include a lack of knowledge of what is a coastal vulnerability assessment, who to contact and what the costs may be, a lack of available resource within the club to coordinate the assessment and an increase in the costs of the planned improvement works.

To date the costs for these coastal vulnerability assessments have been approximately \$15,000 per project, depending on the scope of works and on the LGA in which the club is located; a potential \$3million+ burden on surf life saving nationally.

Further, and in a growing number of LGAs, coastal vulnerability assessments have been completed by the LGAs in the role as land managers and in many instances as owners of the surf lifesaving club facilities. On occasion, assessment results are not readily available to community groups such as surf life saving, necessitating additional assessments, the need for which is questionable.

However, it must be stated that in a majority of cases local government is a significant supporter of surf life saving for which SLSA and our members are extremely grateful.

Recommendation 2

LGAs be required to share the outputs of any relevant coastal vulnerability assessments to all community groups in the area(s) assessed, without charge.

Recommendation 3

State and Territory Governments to be provide common guidance on when a coastal vulnerability assessment is required.

⁴ Good, M., Technical Report: Government Coastal Planning Responses to Rising Sea Levels, Australia and Overseas Antarctic Climate & Ecosystems Cooperative Research Centre, July 2011

Behavioural and cultural barriers – result from constraints on the decision-making abilities of individuals, and may arise, for example, due to cognitive factors or cultural values

As is often the case, the clubs which are most impacted or at risk have little if any capacity to respond as they have limited knowledge of climate change adaptation and policy or legislation, little spare membership capacity to investigate and minimal financial resources.

The resultant is that adaptation is ignored in favour of more familiar and traditional club activities or that inappropriate adaptation measures are taken.

Recommendation 4

Policies and legislation should include a requirement to engage, inform and support community groups, particularly those providing social and humanitarian services, where climate change adaptation capacities are non-existent or limited.

Organisational barriers – are constraints on the decision-making abilities of organisations, including large firms and government agencies

The largest organisational barrier to climate change adaptation witnessed by SLISA to date is the ‘every man/woman for himself/herself’ syndrome. There seems to be an operating environment where each organisation needs to learn what is needed to adapt which on one hand is creating a ‘climate change adaptation’ economy, but which is impacting community groups both economically and socially.

Further, the level of duplication of effort and costs should not be underestimated.

The response should be to foster collaboration at all levels, a theme outlined by Elrick (Elrick, C., 2011) in her Report for SLISA. In particular the recommendation to *Build capacity to respond to the impacts of climate change by raising awareness, enhancing partnerships and mainstreaming climate change adaptation.*

Recommendation 5

Policies and legislation should not only provide an environment for collaboration but also mechanisms and reporting requirements supported by relevant grants that enable real collaboration, sharing of information and research, and that aims to reduce duplication.

END