



adaptivefutures

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Barriers to Effective Climate Change Adaptation
Productivity Commission
LB2 Collins Street East
Melbourne
Vic 8003

Dear Sir or Madam,

On behalf of AdaptiveFutures please find attached our submission to the Draft Report of the inquiry into **Barriers to Effective Climate Change Adaptation**.

We note that holding a Public Hearing in Western Australia is subject to demand. As such, we encourage the Inquiry to consider the request to visit Perth to ensure national coverage. There is a significant interest in the Inquiry in Western Australia and if a hearing were announced we know that there would be a number of organisations that would like the opportunity to participate.

Yours sincerely,

Dr Robert Kay
Principal Consultant

Submission Focus

Our submission focuses on two key areas.

The first is to reinforce the issues raised in our earlier submission to the Issues Paper regarding clearly defining 'effective' adaptation (October, 2011), given that we believe these have not been properly considered by the Inquiry in its Draft Report.

Second, comment is made on the insufficient emphasis in the Draft Report on the challenges to effectively addressing long-term climate change impacts, rather than the short-term emphasis on climate variability within the Draft Report.

Adaptation Effectiveness

The Inquiry Issues Paper was correct in its view that 'effective adaptation' is 'open to interpretation' (p.5). Also, the Issues Paper states: "in general terms, effective means producing the desired or intended result, but something more specific may be required for the purposes of this inquiry." (p.5). As we outlined in our initial submission to the Inquiry, this fundamental question is one that has been taxing national governments overseas, multilateral organisations and a host of other organisations worldwide tasked with ensuring that adaptation is 'the best it can be'. We provided the Inquiry with an extensive list of references drawn from our experience working with clients in Australia and overseas seeking to develop operational principles of effective adaptation.

The Inquiry Draft Report states (p.5):

'Effective' climate change adaptation should be interpreted to mean adaptation actions that enhance the wellbeing of the community.'

This may be viewed as a high-level adaptation goal. For this goal too to be useful for developing meaningful policy to support effective adaptation, it must be translated into a set of tangible objectives and potentially national adaptation Key Performance Indicators (KPIs) or similar. Without developing such tangible measures, it will be impossible to determine if Australia's adaptation responses are effective or not.

Consequently, the Inquiry is strongly encouraged to re-examine the information we previously provided on adaptation effectiveness and to examine international initiatives undertaken in recent months published since our earlier submission¹.

Long-term Climate Change vs Short-term Climate Variability

The Draft Report is significantly weakened by an underpinning flaw that asserts that better management of current climate variability (around a stable average) will be the most effective response to managing both future climate variability (around a changing average) and changes to average conditions. This assumption is not borne out by the results of the many climate change impact assessments undertaken in Australia (including those in which we have been involved) that have recognised the need to develop an optimal mix of measures to build resilience to current extremes, with those that ensure that potential long-term impacts are

¹ For example: See Outcomes of the 7-8 May Workshop - **Tracking Successful Adaptation. Smart Monitoring For Good Results** http://www.bonn-perspectives.de/en/dialogue-events/archive/tracking_adaptation/results.html

incorporated into decisions with long-timeframes – such as the siting of new residential subdivisions, or the location of critical infrastructure.

While it is understandable that the Draft Report stresses that improving the management of current climate impacts will build resilience – that we support – this emphasis is at the expense of understanding how changes in climate exposures will require significant, sustained, long-term actions. The report makes the flawed assumption that the most effective way to deal with these issues is to push these ‘autonomous’ actions into the distant future. There is no compelling evidence presented by the Draft Report to justify this assertion – either through economic modelling, analysis of the numerous climate change impact and adaptation plans developed by Australian governments and companies, or through review of the submissions to the Issues Paper and the Inquiry’s consultations.

The Draft Report also makes a fundamental assumption that future climate change impacts will be most effectively dealt with when these impacts are actually occurring. These are termed ‘autonomous adaptations’². In contrast, ‘planned’ or ‘anticipatory’ adaptive actions are not sufficiently addressed in the Draft Report.

Indeed, the extensive list of Information Requests in the Draft Report points to a recognition by the Inquiry that insufficient attention to consideration of long-term climate change impacts and adaptation requirements. This is particularly clear given that Information Requests targeted at better understanding the role of land management systems and development approval processes in seeking to avoid, or minimise, long-term climate change.

Consequently, the Inquiry is strongly urged to closely analyse the wealth of information available that provides impact assessments to focus the Inquiry on its core objective of recommending effective approaches to the urgent need for substantive and consistent actions to for Australia to address the considerable adaptive challenges it faces.

About AdaptiveFutures

AdaptiveFutures is a niche consulting company that supports the climate change adaptation needs of governments, private sector, communities and individuals worldwide. We support public, private and community organisations develop effective responses through research, analysis, facilitation and field studies – from global level strategic adaptation projects through to local impact assessments.

Examples of selected projects and publications demonstrating the depth of our experience can be found on the AdaptiveFutures website www.adaptivefutures.com.

² See IPCC Glossary: <http://www.ipcc.ch/pdf/glossary/ar4-wg2.pdf>