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Productivity Commission
Locked Bag 2
Collins Street East
MELBOURNE. VIC. 8003.

Dear Commissioners

**SUBMISSION FROM GIPPSLAND COASTAL BOARD ON
DRAFT REPORT, BARRIERS TO EFFECTIVE CLIMATE CHANGE ADAPTATION**

Thank you for the opportunity to comment on the draft report on Barriers to Effective Climate Change Adaptation.

The Gippsland Coastal Board congratulates the Productivity Commission on a very comprehensive discussion of potential barriers to effective climate change adaptation. The Board supports many of the recommendations but has concerns about some other aspects of the report. These are outlined in the attached submission.

We would be happy to expand on these points at a public hearing.

Yours sincerely,

Chair
Gippsland Coastal Board

SUBMISSION BY GIPPSLAND COASTAL BOARD
PRODUCTIVITY COMMISSION DRAFT REPORT ON
BARRIERS TO EFFECTIVE CLIMATE CHANGE ADAPTATION

The Gippsland Coastal Board (GCB) congratulates the Productivity Commission on a very comprehensive discussion of potential barriers to effective climate change adaptation.

The GCB supports the following aspects of the draft report:

- The recognition that ‘effective’ climate change adaptation should be interpreted to mean actions that support the well-being of the community (p.5).
- The description of the types of barriers that may occur to effective adaptation (p.6).
- The recognition that the distributional impacts of climate change many require specific policy responses to address equity concerns for disadvantaged and vulnerable groups (pp.8-9) and that these should take into account the other challenges these groups face (p.17).
- The suggestion that adaptation actions should focus immediately on addressing climate variability and extreme weather events that are already happening (p.10, p.245).
- The need for improved hazard mapping – although this is not only an Australian Government responsibility, as suggested in the report – and improved communication of risk to residents (p.11, p.247), to be addressed through current initiatives to improving dissemination of flood risk information and extending this to other natural hazards (draft recommendation 6.1).
- Recognition of the key role of local governments in adaption and of the capacity constraints experienced by many councils (p.13, p.18, pp.120-124)
- The call for clarification by state governments of local government roles, responsibilities and legal liabilities (p.11, draft recommendations 7.1 & 7.2).
- The recommendation that local governments should adopt a risk management approach to land-use regulation in local planning schemes (p.16) and that planning systems should be revised to ensure that they are sufficiently flexible to accommodate this (draft recommendation 8.1).
- The suggestion that COAG’s Select Council on Climate Change should develop national approaches or principles to support strategic management of climate change risks for existing settlements (p.17, p.167, draft recommendation 8.3).
- The recognition that disaster mitigation actions – by local government, public authorities or individuals – may cause externalities that affect the environment, the community and adjoining jurisdictions and the suggestion that consideration of such actions should be incorporated into broader strategic plans (p.181).

The Board is concerned about other aspects of the Commission’s draft report, including:

- The stress on private responsibility for managing climate risks faced by individuals and households and the limited role assigned to governments – which is essentially only facilitation, other than for reasons of equity (p.8).
- The reiteration of comments about the ‘uncertainty’ of climate change impacts and the consequent assignment of a lower priority to actions to anticipate them, including making changes to land-use planning regulations (pp.10-11).

Experience indicates that the introduction of major changes to planning systems can take several years and the application of new tools by local governments and other planning

authorities may have a lag time of at least as long. (The report acknowledges this problem on p.161, in relation to planning for bushfire hazard.) These delays in implementation are due to the fact that detailed controls often depend on regional or local studies being undertaken as a basis for defining the areas to which they will apply, as well as the time taken for exhibition and approval processes for changes to planning schemes.

- The fact that, despite acknowledging the severity of capacity constraints on local government, which make it difficult for councils to fulfil their roles in effective adaptation, the report does not recognise any necessity for the Commonwealth to contribute to overcoming these resource deficiencies (p.18). Instead, it puts the onus of improving local government capacity solely on state and territory governments (p.13).

The GCB believes that there is a continuing role for Commonwealth funding programs to support adaptation planning for local government. Ideally, these should be based on need and not competition between councils.

- The narrow definition of adaptation adopted by the inquiry (though we acknowledge that this is in line with the terms of reference) that excludes consideration of adaptation by ecosystems (p.27). Adaptation by ecosystems is considered briefly late in the report, but no recommendations are made in relation to it. The Board considers that adaptation needs to be considered in a holistic manner and therefore should include consideration of the natural environment.

Gippsland Coastal Board

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