



Environmental Defenders Office

11 April 2024

National Adaptation Policy Office

Department of Climate Change, Energy, the Environment and Water

Submitted via: [DCCEEW Consultation Hub](#)

Dear National Adaptation Policy Office,

Consultation on the National Adaptation Plan Issues Paper

Environmental Defenders Office (**EDO**) welcomes the opportunity to make a submission on the National Adaptation Plan Issues Paper. EDO strongly supports the development of a National Adaptation Plan, and notes this was a recommendation in EDO's Roadmap for Climate Reform.¹

This submission makes recommendations in 6 areas in relation to the Issues Paper:

- 1. Ongoing mitigation actions are essential for adaptation planning.**
- 2. Adaptation planning must rely on the best available science.**
- 3. Adaptation must be embedded into all relevant policy and decision-making.**
- 4. Adaptation planning should be informed by equity.**
- 5. First Nations communities should be able to determine their own adaptation actions.**
- 6. The Plan should require regular monitoring, reporting, and updating.**

The National Climate Adaptation Plan needs to be coordinated, integrated and flexible, but also needs to recognise that while everyone, everything and everywhere is affected by climate change, not everyone, everything or everywhere is affected equally or in the same way. Australia and its external territories cover latitudes from the tropics to the South Pole. Its climate is unique as are its regional challenges.

EDO is of the view climate change should inform decision-making across the economy, and cannot be siloed to one discrete policy area. The impacts of climate change are not solely an 'environmental' issue but will have consequences for almost all areas of Australian society and its economy. We support the approach of the Adaptation Plan Issues Paper to consider adaptation actions in relation to different 'domains', which illustrates the widespread nature of the climate crisis. Addressing climate change will require a whole of government approach, which may require whole of government reform of both policy and legislation where appropriate. Climate change considerations and analysis need to be fully built-in to mainstream policy making across all relevant agencies and all levels of government, and adequate resourcing is essential.

1. Ongoing mitigation actions are essential for adaptation planning.

Australia is already experiencing the impacts of climate change, which include the warming and acidification of oceans, sea level rise, increased and more intense rainfall in the north of the country, and long-term increases in extreme fire weather. Last year was the hottest year on record,

¹ EDO, [Roadmap for Climate Reform](#) (2022).

and environmental indicators across all ecosystems are showing decline (exacerbated by climate change).² The impacts of climate change are not just environmental: there are, and will be further, significant implications across all sectors, including health, the economy and national security.³ Adaptation planning is crucial so Australia can cope with the impacts already being experienced, as well as the inevitable increase in impacts felt as the earth continues to warm.⁴

However, the impacts and consequences of climate change in the medium and longer term depend on how successful mitigation efforts are, and under high-warming scenarios they could be much more severe than lower warming scenarios. A global goal for adaptation is to enhance adaptive capacity, strengthen resilience and decrease vulnerability to climate change – it is the latter in particular, that can best be achieved by mitigation.⁵ The IPCC has confirmed that to avoid the worst impacts and costs of climate change, we need to limit warming of average surface temperatures to no more than 1.5°C above pre-industrial levels. The window of time to achieve this goal is closing.

EDO **recommends** the Federal Government adopt much more ambitious emissions targets⁶ and include the transition to net zero in the Adaptation Plan. The Government must immediately stop approving new fossil fuel projects, and phase-out subsidies and tax concessions that create incentives to pollute, or act as a barrier to emissions reduction. Subsidies should be, in part, redirected to adaptation planning.⁷

2. Adaptation planning must rely on the best available science.

For good adaptation planning, the worst-case scenario approach should be applied for different time horizons, including tipping points in the longer term (i.e. beyond 2050). For example, the La Trobe University Climate Adaptation Plan used the worst-case climate modelling pathway to support long-term planning for a changing climate (i.e. the pathway of IPCC AR6 Representative Concentration Pathway (RCP) 8.5, which would lead to a temperature increase of about 4.3°C by 2100 relative to pre-industrial temperatures).⁸

Conversely, the National Climate Risk Assessment First Pass Assessment Report used average global warming scenarios associated with 1.5°C (low emissions) and 2.0°C (high emissions) increases by 2050, and 2.0°C (low emissions) and 3.0°C (high emissions) increases by 2090.⁹ Given

² The Guardian, “Off the charts’: 2023 was hottest year ever recorded globally, US scientists confirm’ 13 January 2024, <https://www.theguardian.com/environment/2024/jan/12/2023-hottest-year-record-us-scientists#:~:text=Off%20the%20charts'%3A%202023.confirm%20%7C%20Climate%20crisis%20%7C%20The%20Guardian,Australia's%20State%20of%20the%20Environment%20Report%202021>.

³ Intergovernmental Panel on Climate Change, Global Warming of 1.5°C. An IPCC Special Report on the impacts of global warming of 1.5°C above pre-industrial levels and related global greenhouse gas emission pathways, in the context of strengthening the global response to the threat of climate change, sustainable development, and efforts to eradicate poverty (2018).

⁴ UN Environment Programme, ‘Temperature rise is ‘locked-in’ for the coming decades in the Arctic (13 March 2019), <https://www.unep.org/news-and-stories/press-release/temperature-rise-locked-coming-decades-arctic>.

⁵ United Nations Framework Convention on Climate Change Conference of the Parties 21, Adoption of the Paris Agreement, ‘Annex -Paris Agreement’, Article 2 (FCCC/CP/2015/L.9/Rev.1), article 7.1.

⁶ See, EDO Submission to the [Climate Change Authority on setting, tracking and achieving Australia's emissions reduction targets \(30 June 2023\)](#).

⁷ As well as to emissions reduction more generally, renewable energy storage technology development, environment protection, economic transition and community development.

⁸ [La Trobe University Climate Adaptation Plan, RCP 8.5: Business-as-usual or a worst-case scenario? - \(climatenexus.org\)](#).

⁹ [National Climate Risk Assessment: First pass assessment report - DCCFEW](#)

the trajectory we are on, when looking at the longer term (post 2050), the ‘worst case’ global warming scenario of >4°C and occurrence of tipping points should be incorporated into adaptation planning to ensure we are as prepared and flexible as possible to cope.

Moreover, the IPCC Assessment Report 6 is used in the National Climate Risk Assessment First Pass Assessment Report as a basis for the different scenarios and to provide a basis for adaptation planning.¹⁰ Since publication of these documents in 2022, the world experienced the warmest year on record in 2023, with global mean near-surface temperatures $1.45 \pm 0.12^\circ\text{C}$ above the pre-industrial 1850-1900 average.¹¹ While the rate of global warming is within the range of what is expected, it is also expected that the rate of warming will increase as atmospheric carbon dioxide concentrations continue to increase. As new research emerges and understanding advances about the rates of warming and change in the climate system (including beyond temperature, such as the water cycle and atmospheric processes), potential regime shifts and tipping points, the National Adaptation Plan and strategies should be flexible and able to adapt to advances in understanding that occurs between the IPCC cycles.

Adaptation planning should recognise that there will always be uncertainties regarding long-term climate trends and impacts, but this should not be used as a reason for inaction or inadequate preparation, planning and anticipation of what may happen under different scenarios.¹²

3. Adaptation must be embedded into all relevant policy and decision-making.

EDO agrees that adaptation measures should be embedded into all relevant policy and decision-making, and that considering climate risk must be mandatory, and ‘business as usual’ for governments, communities, and individuals.¹³ Consideration of climate change, both adaptation and mitigation, and a prohibition on acting inconsistently with the best available science, needs to be integrated into a wide range of decision-making processes under relevant laws. Policies and projects with long-term consequences should consider climate change and incorporate adaptation plans for different scenarios.¹⁴

In relation to planning, heritage and environmental approval regimes specifically, adaptation and mitigation considerations need to be deeply integrated. This should be in the form of clear duties and legal obligations on decision-makers, and in consideration with cumulative impact analysis. For example, EDO **recommends** under the proposed nature positive national law reforms, the new national Environment Protection Australia (EPA)¹⁵ should have a clear duty to support ecologically sustainable adaptation to manage the impacts of climate change. All jurisdictions should recognize the impacts of climate change as a key threatening process.¹⁶ Recovery planning must also remain mandatory for climate impacted threatened species and communities; and recovery planning must include specific requirements to identify and address climate change impacts. Legislation should include emergency listing provisions and other responsive powers that provide

¹⁰ [IPCC_AR6_WGII_FrontMatter.pdf](#) and [IPCC_AR6_WGII_SummaryForPolicymakers.pdf](#)

¹¹ [Climate change indicators reached record levels in 2023: WMO](#)

¹² [Integrating Climate Change Adaptation into Development Co-operation: Policy Guidance \(oecd.org\)](#).

¹³ National Adaptation Plan Issues Paper (2024) 1.

¹⁴ E.g., large-scale infrastructure projects, transport networks, major land-use planning initiatives, and urban development master plans. [Integrating Climate Change Adaptation into Development Co-operation: Policy Guidance \(oecd.org\)](#).

¹⁵ Department of Climate Change, Energy, the Environment and Water, Nature Positive Plan (December 2022) 4.

¹⁶ See, EDO [Roadmap for Climate Reform](#), 26.

for necessary intervention when threatened species and ecological communities and critical habitats are impacted by climate events such as bushfires.

Finally, successful adaptation relies upon understanding and planning for cumulative impacts. For example, the potential cumulative impacts of successive extreme events (i.e. repeat flooding or bushfires) or prolonged events, such as droughts. The Adaptation Plan Issues paper does not currently address the need to plan for cumulative impacts, and EDO **recommends** it do so.

4. Adaptation planning should be informed by equity.

The scientific, social, economic, human rights and environmental imperatives for limiting warming to 1.5°C are clear – this is particularly so for overburdened and structurally disadvantaged communities who are more likely to bear the brunt of climate inaction. Overburdened people and communities, including First Nations communities, people of the Global Majority,¹⁷ elderly people, young people, women, and people living with disability, disproportionately feel the effects of climate impacts.

EDO agrees that adaptation works best if the solutions are designed and implemented as close as possible to where the impacts are being felt,¹⁸ and that overburdened communities should always be given the opportunity to drive their own adaptation strategies and actions. Natural disaster planning and adaptation planning should be on an environmental justice basis, not just an economic one. That is, the government must identify at risk communities and target adaptation responses to those most at risk from or disadvantaged by the climate change already locked in. As such, EDO **recommends** that equity should be a guiding principle for the development of the Adaptation Plan. Similarly, all adaptation planning should consider human, environmental and ecosystem health.¹⁹ Human rights principles should be made explicit in the National Adaptation Plan, including the right to a healthy environment, clean air, clean water, and the possible impacts of re-location of communities as climate impacts increase.²⁰

EDO **recommends** the Australian Government must retain a lead role not only in coordinating, but also in funding adaptation actions around the country and enabling overburdened communities to adequately respond to climate change where they would not be able to do so otherwise (rather than relying on private capital to fulfill this function).

5. First Nations communities should be able to determine their own adaptation actions.

Climate change will impact on First Nations' communities, cultural heritage, and ways of life. First Nations communities are not only more likely to be at risk from the impacts of global warming, but also to be disadvantaged from climate policies and measures which lack equity considerations.²¹ First Nations people must be the ones who make decisions about adaptation actions in response to these impacts; and the government must remove barriers so First Nations communities can

¹⁷ A collective term that encourages people from non-European ancestries to think of themselves as belonging to the global majority. It refers to people who are Black, African, Asian, Brown, dual-heritage, Indigenous to the Global South and/or racialised as 'ethnic minorities'.

¹⁸ National Adaptation Plan Issues Paper (2024) 3.

¹⁹ See, EDO [Submission to the Department of Health and Aged Care on the National Health and Climate Strategy \(24 July 2023\)](#).

²⁰ See e.g., EDO [A Healthy Environment is a Human Right report \(2022\)](#).

²¹ Kate Crowley and Oshan Jayawardena, 'Energy disadvantage in Australia: policy obstacles and opportunities' (2017) International Conference on Improving Residential Energy Efficiency, IREE (<https://www.sciencedirect.com/science/article/pii/S1876610217334835>).

protect their Countries and cultural heritage as they deem fit. The right of self-determination is expressed in article 4 of the United Nations Declaration on the Rights of Indigenous People (UNDRIP) as the right to “autonomy or self-government in matters relating to their internal and local affairs”.²² Self-determination is particularly important for First Nations peoples in Australia, who are still overcoming the ongoing impacts of colonisation, including dispossession of land. EDO **recommends** the National Adaptation Plan embed the right to self-determination in all adaptation planning and actions.

EDO **supports** the commitment in the Issues Paper to a First Nations-led process to identify the climate risks for the First Nations’ values and knowledges system and prioritise and assess the most significant risks to underpin adaptation actions and strategies.²³ Where possible, co-benefits of adaptation actions should be encouraged by the Plan – for example where adaptation actions and caring for Country result in improved environmental, cultural and economic outcomes for relevant communities.

6. The Plan should require regular monitoring, reporting, and updating.

Monitoring and reporting progress against the Plan is important. EDO supports the Climate Change Authority recommendation that the National Adaptation Plan be legislated with updates at least every five years, with legislation to cover ongoing monitoring and evaluation of the plan.²⁴ EDO also supports a role for both the Climate Change Authority, and new EPA to assess and advise on progress towards adaptation measures, and continuous improvement based on best available science.

Adaptation actions should be bolstered by secure, ongoing funding for long-term coordinated monitoring and assessments that could be utilised by other levels of government. This should be backed in by improved funding for Australia’s climate modelling and forecasting capabilities, and efforts to ensure information is as up to date or ‘real time’ as possible.

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Yours sincerely,

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²² United Nations Declaration on the Rights of Indigenous Peoples, GA Res 61/295, UN Doc A/Res/61/295 (2 October 2007, adopted 13 September 2007) art 4.

²³ National Adaptation Plan Issues Paper (2024) 25.

²⁴ National Adaptation Plan Issues Paper (2024) 11.