

Submission on National Climate Resilience and Adaptation Strategy (NCRAS) 2021 Consultation

NCRAS Taskforce

10 September 2021

About ACOSS

The Australian Council of Social Service (ACOSS) is a national voice in support of people affected by poverty, disadvantage and inequality and the peak body for the community services and civil society sector.

ACOSS consists of a network of approximately 4000 organisations and individuals across Australia in metro, regional and remote areas.

Our vision is an end to poverty in all its forms; economies that are fair, sustainable and resilient; and communities that are just, peaceful and inclusive.

Summary

We welcome the opportunity to make a submission to provide input on the development of a new National Climate Resilience and Adaptation Strategy (NCRAS) towards a climate-resilient Australia.

Climate change is having a significant impact on people experiencing financial and social disadvantage and on the community service organisations that support them.

Australia has already experienced temperature rise of 1.3 degrees since pre-industrial levels, and the science tells us we have already looked in temperature rise of 1.5 degrees and possibly 2 degrees based on current greenhouse gas emissions. It is therefore critical that Australia has a plan to build climate resilience and help people and communities adapt to increasing climate change impacts.

The NCRAS should look to strengthen national coordination to manage social impacts, in addition to physical climate impacts. And should include a stronger focus on people and communities, including community sector organisations.

Successful adaptation is improving the outcomes of people experiencing disadvantage, rather than simply ensuring that they are not worse off. Building

resilience to climate change is an opportunity to reduce entrenched inequality by addressing the factors that heighten vulnerability.

We note that the NCRAS task force is only seeking feedback on limited content, and we strongly encourage a further round of consultation on a draft National Climate Resilience and Adaptation Strategy.

Recommendation 1: NCRAS taskforce Undertake public consultation on a draft of the updated National Climate Resilience and Adaptation Strategy

The full strategy should be developed in partnership with key stakeholders, including states and territories, industry, community sector, indigenous communities, local communities and people experiencing disadvantage.

This submission will briefly provide context on why a National Climate Resilience and Adaptation Strategy should include a stronger focus on people and communities, including community sector organisations.

The submission will then respond to:

- Questions in the task force survey, specifically:
 - How is the community sector adapting or planning to adapt to the impacts of climate change?
 - The government roles and responsibilities document developed in 2012.
- Identify gaps in the current National Climate Change Resilience and Adaptation Strategy 2015; and
- The 3 pillars being considered as part of the updated National Climate Change Resilience and Adaptation Strategy.

Discussion

Why a National Climate Resilience and Adaption Strategy should have stronger focus on people, communities, and the community sector.

People experiencing disadvantage are most vulnerable to climate change impacts

Climate change is not only a threat to our environment, it threatens people's homes, livelihoods, mental and physical health, quality of life, employment and

increases risks and burdens for future generations. It is a social justice and intergenerational equity issue.

Climate change hits people living on low incomes or experiencing disadvantages first and hardest. They have the fewest protections from climate change impacts and live in the most affected places.

People with fewer resources and capabilities have less money, choice, power, and social connections to cope, adapt or recover. Failing to halt climate change will cause greater poverty and inequality in the future.

Australians most vulnerable to climate change impacts and mitigation measures include:

- Frail older people and people with chronic health conditions.
- Aboriginal and Torres Strait Islander peoples.
- Single parents and their children.
- Newly arrived migrants and refugees.
- People with a disability and the people who care for them.
- People out of paid work and living on low, fixed incomes.
- People living in poor quality housing or in the private rental market.

The heightened vulnerability of these groups arises from a number of factors, including that they:

- Tend to live in areas more likely to be adversely affected by climate change (e.g. areas exposed to heatwaves, floods, storms or bushfires) and have far less ability to move, make other necessary adjustments to their living circumstances or respond to emergencies;
- Tend to have the least efficient, highest energy consuming appliances.
- Spend a greater proportion of total weekly household income on housing, energy and water and are therefore more vulnerable to price increases for these necessities.
- Are less likely to have the financial capacity or access to implement energy efficiency, adaptation measures, or to purchase renewable energy technologies such as solar and batteries.
- Are more likely to live in public housing or the private rental market and therefore lack the power or adequate incentives to introduce adaptation, energy efficiency measures or renewable energy sources; and
- Are less socially connected.

The impact of climate change will also differ depending on location: including factors such as geography, access to services, and demographics. For example, regional communities are likely to experience greater challenges with the ability to adapt, cope and recover from extreme weather events, especially in more remote communities.

Aboriginal and Torres Strait Islander communities are likely to face the greatest challenges and will require specific attention. Aboriginal and Torres Strait Islander communities already experience multiple existing challenges including remoteness, poor health, inadequate infrastructure, lack of

educational and employment opportunities, and low incomes. Climate change impacts and poor mitigation measures will exacerbate many of these pre-existing challenges.

In addition, workers and communities in transition, for example, coal regions such as the Latrobe Valley in Victoria, the Hunter Valley region in New South Wales, Gladstone and Rockhampton in Queensland, and Collie in Western Australia also need specific attention.

Successful adaptation is improving the outcomes of people experiencing disadvantage, rather than simply ensuring that they are not worse off. While important, strategies must go beyond health and wellbeing, and look at all facets that impact on people's ability to enjoy quality of life. Building resilience to climate change is an opportunity to reduce entrenched inequality by addressing the factors that heighten vulnerability.

Community Sector Organisations play a critical role in building climate change resilience and adaptation of communities

The community sector is one of the largest sectors in Australia providing essential services to people, including some of societies most vulnerable people.

Community service organisations (CSO) are embedded within their communities, deliver key services across local communities, have in-depth knowledge of local people, history, risks and vulnerabilities and are best placed to understand and identify their support needs. The services they provide are a critical feature of Australian society, complementing the income support system as well as health and education systems.

As such, community service organisations comprise an essential component of the social infrastructure. Indeed, for many people experiencing poverty, disadvantage and social exclusion, these organisations are often the primary source of connection to the broader community and form the basis of their resilience to everyday adversity as well as in times of crisis.

A major research project by NCCARF, ACOSS and Climate Risk in 2013¹ found that CSOs have a stated desire to prepare for and adapt to climate change and extreme weather impacts but are themselves at risk and lack appropriate supports. And, if well prepared, they have inherent skills, assets and

¹ Mallon, K, Hamilton. E, Black, M, Beem, B, and Abs, J. (2013) Adapting the Community Sector for Climate Extremes. https://www.nccarf.edu.au/sites/default/files/attached_files_publications/Mallon_2013_Adapting_community_sector.pdf

capabilities to enhance community resilience to climate change and in response to disasters.

The lack of formal recognition and resourcing of community service organisations to support communities build resilience to and adapt to climate change, as well as participate in emergency planning and response, has meant that understanding and supporting the preparedness of this critical sector has been overlooked.

How the National Climate Resilience and Adaption Strategy should be amended to include a stronger focus on people, communities, and the community sector

How the sector is adapting or planning to adapt to the impacts of climate change?

The NCRAS survey sort to extract information on how is your organisation adapting or planning to adapt to the impacts of climate change. Rather than respond about ACOSS, it would be more informative to outline how the community sector is adapting or planning to adapt to the impacts of climate change.

A major research project by NCCARF, ACOSS and Climate Risk in 2013² found that:

- CSOs are highly vulnerable and not well prepared to respond to climate change impacts, like extreme weather events, with many small and medium-sized organisations at risk of permanent closure as a result of major damage to physical infrastructure and disruptions to critical services. For example, the survey results demonstrate that one week after an extreme weather event, 50% of organisations that sustain serious damage to their premises would still be out of operation and 25% might never provide services again.
- The detailed consequences of major disruptions to social service provision for people experiencing poverty and inequality are very serious as they give rise to fundamental threats to human survival: homelessness, deprivation, hunger and isolation.
- CSOs have a stated desire to prepare for and adapt to climate change and extreme weather impacts and, if well prepared, they have inherent

² Ibid.

skills, assets and capabilities to enhance community resilience to climate change and in response to disasters.

- CSOs perceive an overwhelming range of barriers to resilience and adaptation. Lack of adequate financial resources and inflexible contracting for service arrangements were key barriers to climate change adaptation. With the concern that adaptation is 'beyond the scope' of the sector's core business.
- Knowledge of the risks, past experience of an extreme event and organisational size are indicators of organisational resilience to climate change impacts, including extreme weather events. Given that organisations have little or no control over their size or the occurrence of extreme events, raising awareness about the direct and serious ways in which climate change and worsening extreme weather events will affect their ability to provide services and therefore to fulfil their mission to people experiencing poverty and disadvantage becomes critical.
- If increasingly frequent and intense extreme weather events represent a new 'normal' for CSO operation, then adapting the community sector for climate extremes must be a priority for governments and other funders.

So while some organisations in the community sector will undertake some of the actions outlined in the NCRAS survey - such as created a formal climate change plan/business continuity plan or strategy to guide decision making, informally considering climate risk in decision making, actively reducing exposure to vulnerable assets and income streams (diversifying or divesting), and actively investing in measures to increase the adaptive capacity and resilience of your existing - these activities are beyond the scope, resources and skills of many community organisations, especially the smaller ones.

And while providing access to relevant information and a decision-making support tool that shows how to consider future climate risks and what steps to take to help me adapt, as suggested in the NCRAS survey, are useful, for many CSOs they are not enough on their own. For example, ACOSS received project funding to develop community sectors specific toolkit³ to help CSOs put in place disaster management and business continuity plans, however, without ongoing funding we have not been able to facilitate and support uptake across the sector.

Recommendation 2: NCRAS recognises that in addition to the provision of information there is a need to fund and support CSOs to build their capability and capacity to ensure they and their clients are more

³ <https://resilience.acoss.org.au/>

resilient to and can better respond and recover from disasters such as bushfires. Including to:

- **Implement disaster management and business continuity plans within the organisation.**
- **Train and support staff and volunteers to implement disaster management and business continuity plans.**
- **Ensure that frontline responders and CSOs have access to key support services, such as vicarious trauma training and psychological support, for staff and volunteers. This should be provided on an ongoing basis.**
- **Grow the diversity of volunteers to reflect community needs and invest in CSOs to help manage the many spontaneous volunteers, who commonly offer support during bushfires and other disasters.**
- **Build the resilience and preparedness of their clients and undertake community resilience activities to boost preparation for disasters and reduce vulnerability. This could include strengthening social networks and connectedness within the community**

Recommendation 3: NCRAS recognises the need for funds to support peak bodies to strengthen the resilience of CSOs:

- **Train and support CSOs to develop and implement disaster management and business continuity plans.**
- **Establish knowledge sharing hubs between CSOs that support collaborations, networks and leadership.**
- **Access and referrals to build capability and capacity of staff and volunteers, including trauma informed services.**
- **Advocacy and communications with governments.**

Strengthen government roles and responsibilities document with respect to roles of community sector and recognition of greater supports required for people.

The NCRAS survey asked respondents to answer the following “when considering the [roles and responsibilities factsheet](#), how do you think the Commonwealth Government could improve delivery of its roles and

responsibilities for climate adaptation and resilience in Australia?”. Our key responses are provided below.

Recognise the role of community services and the health sector in climate change resilience and adaptation

The roles and responsibilities document focuses heavily on the role of government, business, community, and individuals, but makes no recognition of the not-for-profit community services and health sector, one of the largest sectors in Australia. As identified above the community services and health sectors play a critical role in building resilience and adaptation of communities and individuals, particularly people experiencing financial and social disadvantage. We recommend that formal recognition of the roles and responsibilities of the community service and health sectors are included in the document the NCRAS. In addition to recommendations 2 and 3, we also recommend the following:

Recommendation 4: NCRAS recognises the role of the community services and health sector in climate change resilience and adaptation strategy.

Recommendation 5: NCRAS recognise the role of the community service sector to address climate change resilience and adaptation as part of their service provision in service contacts and funding allocation to meet the increasing demand to climate change response and need for adaptation.

Recommendation 6: NCRAS recognises the role of the Community Sector in being responsible for managing risk with respect to public good service delivery, and the need for funding to support the management of risk.

Recognise the role of local communities

While the roles and responsibilities document acknowledge “the community” as having an “important, complementary and differentiated roles in adapting to the impacts of climate change”, the document does not outline what roles local communities can play to support and build climate change resilience and adaptation.

Recommendation 7: NCRAS recognise the vital role of local communities in building climate change resilience and adaptation. And recognise that in addition to providing information to local communities, that funding should be provided to create local community resilience hubs that are community-led and engaged in

building resilience as well as assisting in emergency management planning, response and recovery.

Private parties are not always able to take responsibility for their own actions, assets, investments and risks.

We disagree with the premise set out in the roles and responsibilities document that all private parties (not government) should be responsible for managing risk from climate impacts, and that markets and regulations will support these efforts.

People experiencing financial or social disadvantages are unlikely to be in a position to manage or reduce risks. And while the document recognises the importance of a strong safety net to assist those who may have difficulty in adapting, the current social safety nets are failing in this regard. For example:

- Income support payments of \$44 a day are well below the poverty line
- There is a growing number of people who can't afford to house
- Housing is inefficient
- Long waits for care services that are often of very poor quality
- Insurance is unaffordable
- Threats to the National Disability Insurance Scheme
- Employment services that have failed to reduce entrenched, long-term unemployment
- Failure to 'close the gap' with community-controlled Aboriginal and Torres Strait Islander services forced to run on a shoestring

Recommendation 8: NCRAS reinforce the need for an "adequate" safety net that will contribute to build climate change resilience and adaptation, including:

- **Raise the rate of JobSeeker and other government allowances above the poverty line**
- **Improve the energy efficiency of low-income homes, including implementing mandatory energy efficiency standards in rental properties, to create climate resilient homes**
- **Better targeted energy concessions that meets need.**
- **More affordable homes**
- **Accessible and affordable transport**
- **Accessible green space**

Government programs do not always recognise and do not fund climate change resilience and adaptation activities for financially and socially disadvantaged

people. The aged care sector is somewhat flexible and enables service providers to conduct home safety assessments and emergency plans with home care clients as part of their initial assessment. Gutters can be cleaned and gardens maintained to facilitate home safety. The same cannot be said for recipients of NDIS services, leaving them vulnerable to fire risk and with no clear plan for managing emergencies.

Recommendation 9: NCRAS ensures Government-funded services include the ability for clients to access funds to support resilience and adaptation. For example, adding the following items to the NDIS price guide:

- **Work with the client and carers to develop an emergency plan**
- **Home maintenance and adaptation to mitigate against climate risk. (gutter cleaning, garden maintenance, insulation, window protection)**

Current insurance arrangements are not providing incentives for adaptation and are increasing risk of disadvantage

The document argues that well-functioning markets, can provide strong incentives for adaptation through a price signal. In addition, markets can provide financial mechanisms to help manage risks (eg. insurance). As extreme weather and natural disaster events increase in Australia, insurance premiums are escalating and too many people, particularly people on low incomes, find themselves under-insured or not insured, reducing their resilience to climate change.

Recommendation 10: NCRAS acknowledge limitations of markets in providing support to manage risk and emphasise the need for regulation and policy intervention where markets fail.

Recommendation 11: NCRAS taskforce recommend to Government that it:

- **Establishes a review on insurance affordability in Australia, with regard to worsening impacts of climate change and rising levels of financial difficulty. The review should consider options for ensuring insurance coverage for people on low incomes.**
- **Work with industry should work together to increase the affordability and accessibility of insurance products for people living on low incomes. A range of low-cost products, payment**

options and mechanisms should be made available to make premiums easier to manage.

Gaps in the 2015 National Climate Resilience and Adaptation Strategy

In addition to the recommendations above ACOSS has observed a number of other gaps in the 2016 National Climate resilience strategy framework that should be considered.

People and communities should be included as a key sector in the strategy

The current National Climate Resilience and Adaptation Strategy identifies 8 priority policy areas or sectors including water, agriculture, ecosystems, coasts, cities and built environment, disaster risk management, health and wellbeing and secure and resilient region. ACOSS believes the updated strategy should add another priority area focused on people and communities. The impacts on people and communities go beyond health and wellbeing and have significant social costs.

Recommendation 11: NCRAS include “people and communities” as one of the key target sectors, as well as “health and well-being” as a component.

The principles that guide the strategy should include a principle around equity

The current strategy is guided by six principles, including a principle to ‘assist the vulnerable’. While ACOSS supports this principle and think it is important that people experiencing social and financial disadvantage are front and centre of a climate resilience and adaptation strategy, we believe the principle can be expanded to include equity. Equity broadens the scope of what and how strategies and policies are shaped. For example, the following equity principles is in the Victorian Climate Change Act:

Principle of equity:

It is a guiding principle of this Act that a decision, policy, program or process should have regard to the following—

(a) opportunities should be created by the present generation to increase the capacities within that generation and future generations to adapt to climate change;

(b) in particular, the present generation should consider the opportunities to increase the capacities to adapt to climate change of those people most vulnerable to the potential impacts of climate change;

(c) the present generation should ensure that the health, diversity and productivity of the environment is maintained or enhanced for the benefit of future generations and that any adverse impacts of climate change are minimised for future generations;

(d) the present generation should consider the long-term, medium-term and short-term consequences of decisions, policies, programs and processes that may impact on climate change

Recommendation 12: NCRAS expand the guiding principles to include equity.

Reinforce the need for rapid emissions reduction as first step in building resilience

Recommendation 13: Ensure the updated National Climate Change Resilience and Adaptation strategy includes rapid emissions reductions as a key objective to providing climate change resilience and reducing the investment required in adaptation.

The Strategy should recognise the social dimensions and cost of climate change

The website for the development of the new NCRAS states the new NCRAS will focus on 'strengthening national coordination to manage physical climate impacts' and makes no mention of social dimensions of climate impacts.

Analysis by Deloitte Access Economics finds the social costs of more severe weather events fuelled by climate change is equal to and probably greater than the economic costs.

Recommendation 14: the NCRAS include a focus on social dimensions of climate change impacts.

We also note that successful adaptation can improve the outcomes of people experiencing disadvantage, rather than simply ensuring that they are not worse off. Building resilience to climate change is an opportunity to reduce entrenched inequality by addressing the factors that heighten vulnerability.

Feedback on the proposed 3 Pillars

Pillar 1- Improving climate information and services

Proposed Pillar 1 – Improving Climate Information and Services

High quality climate science and services are needed to inform decisions.

Recent developments:



ACOSS supports the inclusion of a pillar that aims to improve information and services to support resilience building and adaptation. However there needs to be greater focus on social vulnerability, in particular:

- There needs to be a greater understanding and sharing of information about who are at greatest risk to the impacts of climate change and why, to assist in developing appropriate communications, policies and supports.
- The development of an Australian social vulnerability map similar to ClimateJust in the United Kingdom or the Social Vulnerability Index in the United States.
- The information should be accessible and available at local level to support the development of local area resilience and adaptation plans.

ACOSS recommends the following also be included in this pillar.

Recommendation 15: Fund research on who are at greatest risk to the impacts of climate change and why, to assist in developing appropriate communications, policies and supports.

Recommendation 16: Ensure climate and information services include social indicators to help with local adaptation and resilience plans, and

for this data to be available online and at a local level i.e a social vulnerability map. This might include:

- indicators of social vulnerability (e.g. housing stock, income levels, health issues, access to transport);
- communities or groups that are at risk;
- the lived experiences of people in that community;
- potential needs and resources of those communities;
- ways to build community resilience;
- recognise that the community themselves are best placed to know what is needed.

Recommendation 17: Climate information and services need to be accessible to organisations and populations that may have reduced adaptive capacity, including to those for whom English is not their primary language, and those with disabilities that impact on how they access information.

Pillar 2 - Supporting Partnerships and Collaboration



ACOSS supports the inclusion of a pillar that focuses on supporting partnerships and Collaboration. The NCRAS must empower communities to build their resilience and adaptation on their terms. Which requires a need for genuine **community** partnership and collaboration, including with Aboriginal and Torres Strait Islander peoples, communities and organisations (as outlined in the Closing the Gap Partnership Agreement).

Partnerships should also extend across and between sectors and Government portfolios.

Recommendation 18: The NCRAS should support genuine partnerships and collaboration, including with people most impacted, and extend across sectors, levels of government and government portfolios

The strategy should also recognise and integrate the National Disaster Resilience Framework and the National Disaster Recovery and Resilience Agency.

Recommendation 19: the NCRAS should integrate with the [National Disaster Resilience Framework](#) and the [National Disaster Recovery and Resilience Agency](#)

Pillar 3- Bringing together a national picture

ACOSS supports the need for national risk assessment, monitoring and evaluation process.

Risk assessments assessment needs to take into account social and health dimensions.

Recommendation 20: NCRAS risk assessments should consider social and health dimensions.

Acknowledgements

ACOSS prepared this submission in consultation with members of the ACOSS Climate and Energy Policy Network and drew on our [submission to the Bushfire Royal Commission](#); recommendations from the [Community Sector Roundtable on Bushfires hosted by ACOSS, VCOSS and Emergency leaders for Climate Action](#); and [VCOSS Building Resilient Communities](#)

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