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15 April 2011

To whom it may concern

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As the peak conservation body for South Australia, representing over 50 of the State's environment and conservation organisations, the Conservation Council of South Australia (Conservation SA) is pleased to make comment on the Draft Climate Change Adaptation Framework for South Australia.

The adaptation framework has a vitally important role to play in our state's preparations for a future transformed climate change. We support the four statewide objectives, but urge the government to walk its own talk – at the moment the framework does not convey an accurate sense of the level of climate change we can expect given our fossil fuel dominant emissions trajectory. It is vital that the government shows leadership with honest information, and demonstrates how this is informed by the best available science.

Also, as peak oil will interact in a number of ways with our efforts to adapt to climate change, we have suggested that the framework will need to work in tandem with a suggested adaptation framework for peak oil.

We hope these and other comments will be of use and we look forward to ongoing involvement in the development of this critical plank in SA's adaptation response.

If you have any questions regarding this submission please contact Julia Winefield on 8223-5155 or via email: [julia.winefield@conservationsa.org.au](mailto:julia.winefield@conservationsa.org.au).

Yours sincerely,

A handwritten signature in black ink that reads "Tim Kelly".

Tim Kelly  
Chief Executive



# Conservation Council SA

## Conservation SA Response to the Draft Climate Change Adaptation Framework for South Australia

**15 April 2011**

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The **Conservation Council of South Australia Inc (Conservation SA)** is the peak conservation body for South Australia, representing over 50 of the State's environment and conservation organisations.

Conservation SA is an independent non-profit, non party-political, community based organisation which provides resources, advice and representation for the SA environment movement, and which leads many of the key conservation campaigns in SA.

Conservation SA is known for its success in developing long term community development, education, and on-ground environmental restoration programs.

Conservation SA regularly liaises with Local, State and Federal Governments, Government agencies, media, educational institutions, NGOs, unions, industry, business and other groups on matters relating to the environment and social justice.

As a community organisation, much of what Conservation SA achieves is through a large network of skilled volunteers from all walks of life – for its office, on-ground, governance and campaign activities.

Conservation SA is committed to a healthy environment for South Australia.

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## **Introduction**

Conservation SA commends the South Australian Government, Premier's Climate Change Council and Natural Resources Management Council in preparing this Climate Change Adaptation Strategy.

We believe that the structure of the framework is sound and make some suggestions to improve and strengthen the framework and ensure successful implementation.

## **Title and Branding**

Conservation SA does not support the use of optimistic titles for key South Australian planning and strategy documents. The term "Prospering in a Changing Climate", detracts from the meaning of the document which is and must be the "Climate Change Adaptation Framework for South Australia". As an adaptive management framework, this document will need to be updated and maintained by successive governments and should be free of branding. The title also implies that it will be possible to prosper in a changing climate, yet the science suggests that adaptation in a high greenhouse future will be increasingly difficult, hence the complementary need to reduce emissions urgently.

## **Vagueness about expected climate change**

The section titled 'Why we need to adapt' is essentially the document's primary opportunity to convey the urgency and severity of the adaptation task ahead of us. This is the place for the call to action to mobilise the community on this very considerable challenge.

Yet the description here of what we can expect from climate change in coming years is vague to the point of obfuscation. For instance:

"Climate change projections for South Australia indicate warmer and drier conditions across most of the state, with an increased risk of extreme events such as flooding, drought and bushfires" and

"Some of South Australia's key industries worth billions of dollars to the economy, such as the wine, grain and seafood industries, are likely to be affected."

Furthermore, the source for these extremely generic statements is the CSIRO report from 2006. In climate change terms, this report is now using quite dated projections.

To put all this in context, climate scientists (Anderson & Bows, 2011, p 41) are now saying that:

There is now little to no chance of maintaining the rise in global mean surface temperature at below 2°C, despite repeated high-level statements to the contrary. Moreover, the impacts associated with 2°C have been revised upwards.. sufficiently so that 2°C now more appropriately represents the threshold between dangerous and extremely dangerous climate change.

As noted by CSIRO scientist Mark Stafford Smith et al (2011, p 196), “with weakening prospects of prompt mitigation, **it is increasingly likely that the world will experience 4°C and more of global warming**” (emphasis added).

As explained above, this represents **extremely dangerous climate change**.

These recent statements by scientists do not accord with the mild descriptions above, and so from the outset, this critical document seems to establish a frame of complacency. The community will not be able to appreciate the urgency of the need to both adapt to climate change with low emission solutions if the government itself does not provide a broader narrative in this framework about the range of climate risks and how these risks will change over time.

Conservation SA suggests that a solution to area of weakness in the framework is to establish separate but related document that provides a science based narrative on climate change impacts in South Australia. The narrative should be specifically designed to support the framework and inform the decision making by planners, policy makers and engineering personnel. This narrative should be updated on a regular basis as the scientific assessments continue to be refined and when significant new findings are agreed.

While the projections of climate risk associated with high global use of fossil fuels are not pretty, they are very plausible. Consistent with Objective 2, we must start from a premise of using the best information science can provide, and proceed always on that basis. The adaptation framework has a heavy responsibility to demonstrate this principle or it risks a serious loss of credibility.

## **Peak oil – missing in action**

The adaptation framework would also be more credible if it acknowledged that, concurrent with the task of adapting to climate change will be the involuntary transition to a far less oil-intensive economy, as the harsh realities of peak oil play out.

Government documents have a tendency to ignore peak oil completely, rarely even making reference to it, much less planning how we will cope with it.

We are not suggesting that the climate change adaptation framework should also include adaptation to life post-peak, but it needs to acknowledge this other risk and ensure adequate integration. We repeat here what we have said in our own policy blueprint (CCSA 2009) and numerous other submissions: that South Australia needs to conduct an oil vulnerability assessment urgently, and on the basis of this, prepare a peak oil action plan looking at all of the challenges and opportunities this gamechanger presents for our state. Together, these documents would be akin to a peak oil adaptation framework.

The peak oil adaptation framework would need to work in close tandem with the climate change adaptation framework because clearly, the two issues will interact with each other in a number of ways. There are many synergies between peak oil adaptation and climate change mitigation as both involve reducing reliance on fossil fuels. However there will be cases where adaptation to climate change will be rendered more difficult by decreased oil availability – and this must be taken into account in climate change adaptation planning processes.

## Climate change is already having an impact

Throughout this document, climate change is referred to as something that “will be” rather than an occurrence that has already started. Statements such as “The impacts of climate change will affect us all,” fail to provide acknowledgement that South Australia has already experienced increasing approximately 1 degree Celcius of over the past 100 years, and that this change is already affecting the weather events that we experience.

Climate change Adaptation Responses need to be discussed in the present tense not the future. Phrases such as “*adaptation responses we **will** need to make at the state level*”, need to be changed to read “adaptation responses we **now** need to make at the state level”.

## 5 yearly review

Conservation SA supports the 5 yearly review process, but recommends that there be an ability to provide any necessary amendments during the 5 year period.

In addition Conservation SA recommends that the Framework be linked to an annual statement of South Australia's climate future, prepared by the scientific community in language that describes where our climate is heading across short to long term time horizons (see comments under Objective 2).

## Statewide objectives

The four statewide objectives are supported, but we make the following comments.

### Objective 1 -Leadership and strategic direction for building a more resilient state

Objective 1 lacks the imperative for adaptation to be implemented in a way that reduces our impacts on climate change. Conservation SA suggests the following change:

Lead SA's adaptation efforts by building partnerships, incorporating adaptation **[and greenhouse mitigation]** in all decision-making and actively participating in national and international activities.

An additional requirement will be for South Australia's Strategic Plan (SASP) and Planning Strategies to be amended to enable effective climate change adaptation to be implemented across the state. At the moment targets in the SASP, particularly for population and economic growth, are driving planning policies that are in direct conflict with climate change adaptation. To name a few examples, we are seeing:

- Coastal development preventing the inland movement of coastal environments as sea level increases
- High value agricultural land being cleared for housing
- New urban settlements and housing placed in areas of high fire risk, resulting in the further removal of remnant native vegetation

- Poor integration of climate adaptation priorities with state planning.

Changes need to be made in the defining document for our state, the SASP, and flow through to planning strategies and plans such as the Greater Adelaide Plan or we will continue to see these unsustainable and perverse outcomes.

## **Objective 2 -Policy responses that are founded on the best scientific knowledge**

Objective 2 requires a stronger link with the framework, such that an annual South Australian Climate Future Statement and links are provided to give guidance on where South Australia's climate is heading across short to long term timeframes to planners and policy makers.

## **Objective 3 -Resilient, well-functioning natural systems and sustainable, productive landscapes**

While it is good to see some acknowledgement that all South Australians depend on healthy ecosystems, it would be better still for this section to also say upfront that South Australia's ecosystems and species have an intrinsic value quite separate from their utility to humans, and a right to exist that needs to be protected.

Without this key point, it is easy to see the wellbeing of natural systems as something to be negotiated purely on the basis of human self-interest. This mindset is out of date, and we hope that the South Australian government will demonstrate some leadership in promoting the value of nature in a far more holistic way.

## **Objective 4 Resilient, healthy and prosperous communities**

It is also important to acknowledge that resilient, healthy and prosperous communities are dependent on preventing dangerous climate change. (This is often referred to as keeping global temperature to below a 2 degree Celsius increase from pre-industrial levels, though as noted above, the threshold is likely to be lower than this.)

Objective 4 therefore requires a Strategy 4.7 to implement climate change actions in a way that moves towards carbon neutral outcomes, and where that cannot be achieved, to have a net greenhouse reduction because of the adaptation action.

Without such a strategy, South Australia's communities could reach even higher levels of energy and fuel use, resulting in further damage to the natural environment.

## **Regional approach**

Conservation SA supports a regional approach to ensure locally relevant adaptation responses across the 12 existing State Government regions.

## **Adaptation and mitigation are complementary**

Conservation SA strongly commends and supports the approach of this framework for climate change adaptation and mitigation to be recognised as complementary objectives, not alternatives.

These concepts must however be translated into action so that activities to adapt to climate change are implemented in a way that moves towards carbon neutrality, and as an absolute minimum, there is a net greenhouse reduction because of the adaptation action.

## **Who is responsible**

Whilst it is agreed that "Adaptation to climate change is a shared responsibility and involves a joint effort by all levels of government, business, communities and individuals", Conservation SA believes that the leadership role of Government is absolutely essential for businesses, communities and individuals to play their part. The Government must provide the necessary resources to inform communities of the climate risks and engage with communities in how best to adapt to our changing climate.

The South Australian Government also has the highest authority to ensure that South Australia's Strategic Plan and Planning Strategies enable climate change adaptation in the state's future development. As noted above, currently the SASP is working against adaptation on a number of fronts.

## **1.5 Guiding principles for adaptation action**

The Conservation Council of South Australia believes that the need to reduce emissions should be one of the guiding principles in how South Australia adapts to climate change the following principle is suggested:

Seek that actions to adapt to climate change also move towards achieving carbon neutrality and as a minimum, achieve a net greenhouse reduction because of the adaptation action

The following principles are not supported:

Take into account population projections and socioeconomic trends recognising uncertainty and need for flexibility to respond to emerging trends.

Consider the interconnections between social, environmental and economic systems and the linkages between sectors in order to make appropriate tradeoffs where necessary.

Both of these principles are entirely about creating escape clauses that would delay the required need to adapt to climate change. Population projections must not be used to prevent necessary climate change action, and the Climate Change Adaptation Framework will never be successfully implemented with a continued focus on trade-offs as a guiding principle.

The following amended principles are suggested:

Take into account the need for flexibility to respond to emerging trends.

Consider how best to optimise social, environmental and economic systems and the linkages between sectors in planning to adapt to climate change in a sustainable manner.

## Fire Management warrants its own section

With continuing climate change longer and more intense extreme heat waves are being experienced. Fire behavior during these conditions create risks that are higher than communities have prepared for.

Protection of communities during the fire danger periods including catastrophic fire risk days and during extreme fire events should be a major priority for all climate change adaptation plans. Important aspects include planning of human settlements, guiding programs to improve preparedness to existing households and businesses and establishing community fire response plans and safe or safer areas for communities.

Prescribed burning can have both positive and negative impacts on fire risk and biodiversity. It is important that the activity of protecting communities is adequately resourced to ensure that sufficient scientific assessment, monitoring and reporting is undertaken in areas where prescription burning is undertaken.

Prescribed burning can have unintended consequences in promoting rapid growth of weed species, and in harming populations of endangered species. It is therefore essential that the different objectives of protection of communities, asset protection, and biodiversity burning be clearly defined and the results of prescribed burning be assessed over time.

The Framework should guide the provision of adequate resources to ensure that prescribed burning is effective and minimises unintended consequences.

## 4.5 Biodiversity

Whilst the sentiments in this section are commendable, landscape-scale change will be required in already degraded ecosystems to build resilience against the continuing impacts of climate change and to prevent further extinctions. This will require much greater planning and incentives to be established, via South Australia's Protected Areas Strategy, linked to this Framework.

## References

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