



Public Health Association
AUSTRALIA

Public Health Association of Australia submission on the National Adaptation Plan Issues Paper

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The **Public Health Association of Australia** (PHAA) is Australia's peak body on public health. We advocate for the health and well-being of all individuals in Australia.

We believe that health is a human right, a vital resource for everyday life, and a key factor in sustainability. The health status of all people is impacted by the social, commercial, cultural, political, environmental and economic determinants of health. Specific focus on these determinants is necessary to reduce the root causes of poor health and disease. These determinants underpin the strategic direction of PHAA. Our focus is not just on Australian residents and citizens, but extends to our regional neighbours. We see our well-being as connected to the global community, including those people fleeing violence and poverty, and seeking refuge and asylum in Australia.

Our mission is to promote better health outcomes through increased knowledge, better access and equity, evidence informed policy and effective population-based practice in public health.

Our vision is for a healthy population, a healthy nation and a healthy world, with all people living in an equitable society, underpinned by a well-functioning ecosystem and a healthy environment.

Traditional custodians - we acknowledge the traditional custodians of the lands on which we live and work. We pay respect to Aboriginal and Torres Strait Islander elders past, present and emerging and extend that respect to all other Aboriginal and Torres Strait Islander people.

Introduction

PHAA welcomes the opportunity to provide input to the National Adaptation Plan Issues Paper consultation. We support the creation of the National Climate Risk Assessment and the subsequent National Adaptation Plan (NAP).

Climate change is public health's biggest challenge in the 21st century.⁽¹⁾ It is too late to stop climate change,⁽²⁾ therefore, Australia must be ready and resilient for more frequent and damaging climate events, as well as the incremental threats, such as temperature and sea level rise.⁽³⁾

Although climate change is here now, we can stop the impacts from worsening. The Government must reduce Australia's emissions (including exported emissions) and invest in a green future.

In this submission, PHAA presents four priority recommendations. Without including and actioning these priorities within a year of the NAP's release, the Government risks an underfunded *maladaptation* process. We must get this right to protect the health and wellbeing of all who live in Australia.

PHAA priority recommendations:

- **A clear and effective governance structure**
 - With transparent delegation of roles and responsibilities across levels of government and departments and;
 - an inbuilt accountability mechanism and;
 - regular progress reporting on adaptation using indicators that are specific, measurable, achievable, have appropriate timelines, and are evidence-based.
- **A Health in All Policies (HiAP) approach**
 - Use HiAP with all identified risks to ensure actions to address risk are comprehensive and;
 - purposefully consult people with health expertise relevant to the identified 'System' risks.
- **First Nations led adaptation solutions**
 - Increased and consistent funding for Aboriginal Community Controlled Health Organisations and;
 - establish a National Aboriginal and Torres Strait Islander Commission on Climate and Health.
- **Investment in Australia's future**
 - Establish an Adaptation Fund that;
 - Federal, State and Territory governments and the private sector contributes to and;
 - supports adaptation actions in line with the NAP and;
 - has a transparent, accountability mechanism that tracks investment and outcomes.

PHAA also strongly recommends that the Government make a greater commitment to emissions reduction and establish a plan for a green economy that meets or exceeds the Paris Climate Agreement.

PHAA Response to the National Adaptation Plan Issues Paper

Effective and clear governance structure

The Issues Paper indicates that the roles and responsibilities for adaptation will be underpinned by the determination of the 2012 Council of Australian Governments' (COAG) Select Council on Climate Change. This determination indicates that local initiative and individual responsibility will drive climate adaptation.

We agree that adaptation solutions must be community tailored and led. However, without centralised Commonwealth management and investment in capacity and resilience building, necessary adaptation measures may not take place and the present health disparities in Australia may increase. It is unrealistic to place too much emphasis on individual responsibility.

For instance, local government areas (LGAs) have unequal financial resources and face different climate risk exposures.⁽⁴⁾ Australia's 10 wealthiest LGAs are within inner Sydney and Perth⁽⁵⁾ and will experience hotter days and some flooding (Sydney).^(6,7) However, both have the resources to prepare for and recover from such events.

The 10 poorest LGAs are in remote Queensland and the Northern Territory;⁽⁵⁾ areas that are at high risk from destructive and costly disasters, e.g., tropical storms.⁽⁶⁾ Adaptation for these disasters (e.g., reinforcing infrastructure) exceeds more than what individuals and communities should be expected to pay.

Without centralised Commonwealth management and investment, people in these situations will not have the resources to make crucial adaptations to their homes. Lack of governance and investment would cause people to live in unhealthy conditions, risking exposure to Mold, damp, and property destruction.

Governments must be incentivised to actively support, enable and invest in a 'bottom-up' approach. This involves removing the policy, legislative and funding barriers that prevents adaptation action.⁽⁴⁾ Removing these barriers will allow communities and individuals to better protect their homes, health and families in the face of climate change. Such barriers include:

- Lack of workforce with the skills necessary to complete adaptation tasks, particularly in rural/remote communities where workers may need to be flown in and accommodated.
- Shortfalls in funding, especially in communities at high risk of severe climate events and hence require more substantive adaptation action (e.g., evacuation facilities).
- Administrative burden of applying for funding, particularly for local governments.
- Urban planning and building codes.
- Some communities may resist climate science, therefore social barriers may exist.
- Aboriginal and Torres Strait Islander communities must be enabled and resourced to inform adaptation given existing health inequities, unique cultural contexts and deep knowledge systems.

Additionally, the COAG determination states that the role of the Government is to provide leadership. The Government cannot genuinely provide leadership in adaptation without mitigating Australia's emissions.

Much like in public health, although it is important to treat any symptoms (adaptation), symptoms will not lessen or resolve until the root cause of the problem is identified and addressed (mitigation). We are too late to stop climate change, but we can stop it from becoming worse.⁽²⁾ The government must increase efforts to mitigate climate change. The 2020s are a pivotal time to reduce emissions and our reliance on unsustainable energy resources and materials.⁽²⁾

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Simultaneously, adaptation must be expedited. Within this decade over half a million properties in Australia will be at 'medium' to 'high' risk of riverine flooding.⁽⁸⁾ The NAP's action timeline must reflect this urgency. Without a clear governance structure, a HiAP approach, First Nations led research funding and sufficient investment, the actions of this Plan will not be achieved in a timely manner. The priority recommendations in this submission must be implemented within 12 months of the NAP being published.

The governance structure must also allocate responsibility within the Department of Climate Change, Energy and Water to monitor and report on risk adaptation progress across all relevant sectors. Progress should be measured via indicators for each adaptation action and indicators need to be specific, have appropriate timelines, be measurable, achievable and be evidence-based.

Using these indicators, progress reports should be regularly produced to identify where adaption is successfully occurring as a motivator and to ensure accountability to adaptation commitments.

PHAA Recommends: The Government should set national targets of a 75% reduction in greenhouse gas emissions below 2005 levels by 2030 and net zero greenhouse gas emissions by 2035.⁽⁹⁾

PHAA Recommends: This submission's priority recommendations be implemented 12 months from the NAP's publication

PHAA Recommends: A governance plan that clearly delegates jurisdictional roles and responsibilities, includes a funding structure, and an accountability mechanism.

PHAA recommends: Regular progress reporting on adaptation should be assessed via indicators that are specific, measurable, achievable, have appropriate timelines, and are evidence-based.

A Health in All Policies approach

Health impacts of climate change are novel, far-ranging, complex, and require public health action beyond traditional approaches. We welcome the recognition of HiAP in the National Health and Climate Strategy, as well as the identification of health risk most National Climate Risk Assessment 'Systems'.

HiAP aims to promote and achieve better health and wellbeing through all sectors that impact the health of the community,⁽¹⁰⁾ ideally, this eventuates in policy that is co-beneficial for multiple sectors. As identified in the Issues Paper, many of the hazards that impact health lie outside the scope of health departments at all levels of government, as do many of the solutions to these hazards.

For instance, food security depends on secure and sustainable agricultural practices, reliable transport, and safe working conditions for outdoor labourers.^(11,12) Most of the policies required to adapt these various factors against climate change cannot be created or implemented by health departments.

A HiAP approach would ensure that the health risks identified in both the health related 'System' and the non-health related 'Systems' are avoided by the appropriate adaptation measures. To action HiAP, the department should actively seek out health experts in relevant areas and create evidence-based actions for the NAP from the expert's advice.

For instance, for the Primary Industry and Food System's Health and Wellbeing Risk 'risks to physical and mental health of primary producers and their communities', the department should directly involve people with lived experience, non-governmental organisations and academics who specialise in rural health. However, other identified risks in this 'System', such as 'Ecosystem Services' and 'Trade and Export Markets' also have direct impacts on health via water availability and access to fresh produce respectively. We strongly encourage broad HiAP thinking when creating actions for the identified risks in each 'System'.

PHAA recommends: During this next phase of NAP drafting, purposefully consult people with health expertise relevant to the identified risks.

PHAA recommends: Use HiAP with all identified risks to ensure actions to address risk are comprehensive.

First Nations led adaptation solutions

First Nations communities have been specifically identified in the Issues Paper as not only a group who may face uniquely complex impacts from climate change (especially remote communities), but also a group that can be leaders in climate adaptation.

We support this important recognition, but now ask the NAP to turn recognition into action. This action is critical for adaptation, as the impact of climate change on First Nations communities is distinctive from non-Indigenous communities. Other than physical health impacts (e.g., increased waterborne diseases), there are also indirect ‘cascading consequences’ for community resulting from altered natural systems and from altered social systems.^(13–17) There are also non-tangible impacts such as loss of connection and culture affecting social and emotional wellbeing that are unquantifiable.⁽¹⁷⁾ Adaptation for First Nations communities must be led by First Nations solutions.

To ensure these unique health impacts are being managed in a manner that is culturally appropriate for the many distinctively different First Nations communities throughout Australia, there must be increased and consistent funding provided to Aboriginal Community Controlled Health Organisations.

Additionally, we support the Lowitja Institute’s call for a National Aboriginal and Torres Strait Islander Commission on Climate and Health. The Commission would address and enable integrated action on the National Health and Climate Strategy, the National Climate Adaptation Strategy and the National Aboriginal and Torres Strait Islander Health Plan 2021–2031 (with highest relevance to genuine shared decision making and partnerships, workforce and healthy environments, sustainability, and preparedness).

PHAA Recommends: Increased and consistent funding for Aboriginal Community Controlled Health Organisations.

PHAA Recommends: Establishment of a National Aboriginal and Torres Strait Islander Commission on Climate and Health.

Investment in Australia’s future

To achieve the adaptation actions required to protect and preserve health, wellbeing and liveability in Australia, the NAP needs to outline (and the Governments must commit to) a funding plan.

We agree that the significant amount of investment required for adaptation cannot be the sole responsibility of governments. The private sector should contribute their share, particularly considering the private sector’s own significant contributions to Australia’s emissions.

Such contributions must be mandatory, audited and reported on, as voluntary, self-regulated, co-regulated and industry-led commitments to climate change have been consistently ineffective and unenforced.⁽¹⁸⁾

There has to be greater accountability for private sector mitigation and adaptation. It is time for mandatory emissions reductions targets, penalties for failure to meet these targets, and mandatory adaptation investment in line with the NAP’s actions.

Australia has been inactive in mitigating climate change and supporting resiliency. The cost of inaction financially is enormous, modelling suggests inaction will cost trillions globally.⁽¹⁹⁾ This modelling represents productivity, damages, and disruption,⁽¹⁹⁾ however, social costs including health and wellbeing, conflict, migration and inequalities are hard to quantify; indicating that this figure may be considerably larger.⁽¹⁹⁾

It is estimated that every \$1 spent now on adapting to climate change risks, saves society an average of \$6 in future costs.⁽²⁰⁾ Yet, in Australia, 98% of the \$24.5 billion in federal funding spent on disasters between 2005 and 2022 went towards recovery and relief rather than building resilience.⁽²¹⁾

Adaptation is an investment in the near-, mid- and long-term future of Australia.

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The Risk Assessment demonstrates that every sector, department and jurisdiction will be impacted if inaction continues. A dedicated Adaptation Fund investing across areas of impact and essential infrastructure with a transparent, accountability mechanism that tracks investment and outcomes using financial and health and wellbeing indicators should be established.

This fund, which should be paid into by all levels of government and the private sector could ensure the 'bottom up' approach can be done equitably and thoroughly. The NAP cannot expect individuals to be solely responsible for adaptation; barriers to adaptation must be removed and this fund can help.

The Fund should be drawn from to support adaptation actions that align with the NAP. Monitoring and auditing mechanisms should also be established to ensure funds are being used appropriately and equitably. Use of funds should also be subject to regular reporting.

Governments currently invest in fossil fuels through subsidies and tax breaks,⁽²²⁾ investments that will harm future generations. Governments must see the Adaptation Fund as investing in the continued prosperity of Australia. The alternative to adaptation investment will ultimately cost of billions of dollars, human health, lives and dignity, unrest and the ability to continue living in some parts of Australia.

PHAA Recommends: Mandatory private sector emissions reduction, with penalties, independent reporting and monitoring included.

PHAA Recommends: The Federal, State and Territory governments immediately cease subsidies and tax breaks for fossil fuel companies.

PHAA Recommends: Establishment of an Adaptation Fund that Federal, State and Territory governments and the private sector contributes to. The Fund will support adaptation actions in line with the NAP and have a transparent, accountability mechanism that tracks investment and outcomes.

Conclusion

PHAA supports the creation of the NAP. However, we are keen to ensure the priority recommendations we outline in this submission are included in the NAP. These are:

- A clear and effective governance structure
- A Health in All Policies (HiAP) Approach
- First Nations led adaptation solutions
- Investment in Australia's future

Please do not hesitate to contact me should you require additional information or have any queries in relation to this submission



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