Response to the Eurobodalla Climate Action Plan 2022-2023
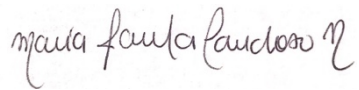
Response to the Eurobodalla Climate Action Plan 2022-2023

29 April 2022

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Cover Image: Tomakin Beach to Mossy Point in the Eurobodalla Council Area. Image by Leah-Anne Thompson, via Shutterstock ID-1311652514

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Introduction

Please consider this a submission for review by the Eurobodalla City Council concerning the released draft Eurobodalla Climate Action Plan 2022-2032 (The Plan). We note and encourage the significant steps the Council has taken and is taking in progressing with this Plan, and we are grateful for the opportunity to respond. We hope to be able to contribute to the Council's work on this critical topic.

The Sydney Environment Institute (SEI) is a national and world leader in multidisciplinary environmental research, known in particular for work in the environmental humanities and social sciences. SEI's purpose is to extend and amplify the scope of the engagement on environmental issues; and to bring together expertise from across disciplines to address key problems in favour of the public good.

As a response, we view our role as to provide the Council with expert and experienced advice on the development and execution of The Plan. We recognise the important work the Council is already engaged in and has already achieved. At the same time, we seek to highlight the opportunities going forward. Accordingly, we have chosen to structure our review around two key themes: (1) Environmental Justice and (2) Ambition. With respect to each we explore the key concepts and principles and then demonstrate their relevance to The Plan, finally focussing on actionable and practical recommendations.

1. Environmental Justice

1.1 Principle

It is excellent to see that the draft plan takes into consideration inequalities experienced by vulnerable groups within the community and the need to offer special protection and support. As recognised in the action plan (Section 1.1.), justice claims are more visible during disasters that affect societies' socially, spatially, and economically. The importance of attention to these different dimensions of the uneven impacts of climate change is affirmed in research on just adaptation to climate change (Clayton, 2018).

The literature on environmental justice points out that the risk of not adopting a justice-oriented approach to policy design is that it can promote ineffective and sometimes harmful policies for the public (Lukasiewicz, 2017). Consequently, the need to observe the principles of justice within each context's particularities is emphasised to avoid harm to the community (Munroa et al, 2017). Within that landscape, local governments, as those closest to the community, are responsible for ensuring this scrutiny to

mitigate and address procedural injustices that negatively affect political outcomes (Cashmore and Wejs, 2013).

Within the context of these principles, we seek to contribute some ideas from research on environmental justice that Council could use in thinking about The Plan. Attention to these different dimensions could assist in creating a toolkit with elements to ensure the best possible outcomes and minimise risk for different sectors and communities.

Schlosberg (2007) develops a framework for environmental justice that sets out several distinct dimensions: distribution, recognition, participation, and capabilities. For The Plan, we will focus on two of the four predominant dimensions of environmental justice commonly used in scholarship and application: participation of the community in the decision-making process (procedural justice), and the fairness of outcomes (distributive justice). The inclusion of this framework encourages a fair approach to resilience in environmental issues.

Procedural justice focuses on the process that is adopted to structure decision-making. It requires fair access for different groups to participate, providing information, support, transparency, fairness, timelines, and space for democratic deliberation. It is, therefore, crucial to design a process that ensures a fair opportunity for all sectors of the community to shape decision-making. Paavola's Environmental Justice framework offers three elements: representation, level of power and process rules (2012). These elements are embodied in public meetings, consultative groups, stakeholder workshops, public presentations, and targeted social consultations, among other examples to be discussed below.

Distributive justice focuses on the effects of climate change and adaptation on residents' daily lives and how these impacts vary across the community (Martin et al, 2013). The distributional approach in a climate action plan should focus on the idea that environmental burdens and resources should be distributed fairly without undue costs to vulnerable communities.

1.2 Relevant section in The Plan

The plan refers to vulnerable communities in several different places:

- Section 1, subheading "Vulnerable Groups and People" identifies the immediate risks vulnerable people and groups can face under a climate crisis. It also outlines some possible actions to mitigate those risks. Actions highlighted in the plan include creation of spaces to share

information regarding climate risks, provision of special warnings to those vulnerable groups and the creation of a plan to face immediate threats of an emergency.

- Section 1, subheading "Special Features" reinforces the importance of creating community networks to challenge isolation, specially of those vulnerable groups.

- Section 3, subheading "Principles used to identify actions" states that equity and the avoidance of maladaptation are relevant principles, where vulnerable communities should not face new burdens due to The Plan.

- Section 3, subheading "Immediate Priorities" emphasises on creating actions to build resilience on those more vulnerable.

SEI sees the inclusion of these references to specific vulnerabilities as a strength of the plan. However, there are few references to concrete actions that can operationalise the principles presented in the Plan. Framed in the theory of procedural and distributive justice, we will provide some basic ideas to incorporate effective participation in the decision-making process and an environmental policy design that accounts for and address conditions of vulnerability.

1.3 Recommendation for how The Plan could better reflect the principle

Ensuring procedural justice requires the creation of participatory spaces in which community groups affected by a decision can have an authentic and impactful influence on that decision. It means that, as part of the environmental plan, the Eurobodalla City Council should concentrate efforts on creating spaces for community members to incorporate their ideas and deliberate in the decision-making process.

Alongside the Council's advocacy strategy to secure NSW Government funding for sustainability improvements, consideration should be given to the allocation of planned community consultation processes. Different vulnerable groups need to be involved in the planning process with transparent and sufficient information about the decisions to be made and space for reflection to ensure that the community's immediate needs are met, and its long-term vision is fulfilled. Funding is necessary because this community consultation process may require a series of short, negotiated policy steps incorporating methods such as in-depth interviews, focus groups and extended workshops (Fincher et al., 2015). As a result, the policy process will be enriched by providing the opportunity to its community members to learn about and contribute to policy development. An example of a consultation process that included

workshops, information, deliberation, and incorporation of community´s ideas is presented in the Blue Mountains 2040 Living Sustainability, Local Strategic Planning Statement (2020).

In terms of distributive justice, the Plan appears to focus on immediate responses to an emergency rather than a stable system for vulnerable groups to adapt and live within a new future affected by climate change. We consider it essential that the Council conducts a vulnerability analysis of its community as part of its adaptation strategy. This will provide a broader understanding of the community's vulnerabilities and the ways in which those vulnerabilities are likely to be exacerbated by climate change. Consequently, the policy design would consider the underlying conditions that create vulnerability and not just the risks of an emergency. Doing so will result in a fairer environmental action plan. An example of a vulnerability assessment was developed by the Sydney Coastal Councils Group in the report "Systems Approach to Regional Climate Change Adaptation Strategies in Metropolises. Mapping Climate Change Vulnerability in the Sydney Coastal Councils Group" (2008).

Addressing the root causes of the vulnerabilities requires intersectional work in different levels and areas. As such, the action plan should consider supporting community-based initiatives that are already creating spaces for this to occur. The partnership with community initiatives links the community to a Council that is supportive of their needs and to the groups that are leading a change in light of their unique context and needs. This interconnection of the local area to address vulnerabilities in an adaptation system to climate change was used by the Blue Mountains Planetary Health Initiative (2021) that connects the Blue Mountain City Council with different community groups, educators, researchers, organisations, and business.

2. Ambition

2.1 Principle

The Intergovernmental Panel on Climate Change (IPCC) Working Group III has very recently released the third, and final substantial instalment of their Sixth Assessment Report (AR6) on climate change. Like the various iterations of past IPCC Assessment Reports, the AR6 demonstrates the urgent need to take actions to:

- mitigate sources of Green House Gases (GHGs);
- adapt to the current and predicted impacts of climate change;
- centre considerations for vulnerable and frontline communities.

Consistent failures to reduce GHG emissions and mitigate climate change more generally represent a clear failure in international environmental governance. There are many causes for this at the international and national levels. Australia often - and with cause - is perceived and singled out as a laggard, generally recalcitrant to commit to significantly transforming its domestic and exporting GHG profiles. While this macro-perspective is important, it erases or at minimum overlooks the ambitious and transformative steps being taken at the State, Municipal and Local levels.

Subnational actions like those taken by communities, towns, cities and regions have multiple implications for the wider context of addressing the impacts of climate change. Not only does ambition at the local level translate to, for example, reductions in GHG emissions, but ambition at the local level can also set in motion social feedbacks that go on to enforce and reinforce the expectation of taking multisystemic and serious action to mitigate and adapt to the impacts of climate change.

Scholars have attempted to model the impacts and dynamics of norms in a variety of settings, investigating the often subtle ways in which social pressure exerts influence and standardising functions. Otto et al (2020), for example, illustrate that social tipping points triggered by an accumulation of factors can activate rapid changes in our economies and societies compatible with the stabilisation of Earth's climate by 2050. In the context of action on climate change broadly construed, institutions like Councils have an influential role in setting the level of ambition for a wide array of actors.

The Plan demonstrates a thorough account of the science of climate change relevant to the Eurobodalla Local Area and surrounding localities. The Eurobodalla City Council has recently taken remarkable steps towards not only reducing GHGs emissions of the municipality and Council operations, but The Plan also evidences important thinking regarding community risk, vulnerability and resilience.

2.2 Relevant section in The Plan

Addressing Council operations and municipal emissions

In the context of climate change and biodiversity loss broadly understood, there are many avenues to approach the challenges at hand. And as a body of local civic authority, a council can have great effect in not only addressing their emissions but additionally the emissions of their constituents.

The 2020 Royal Commission into National Natural Disaster Arrangements (RCNNDA) called for a 'whole of society' response, investing a shared responsibility to all actors. The role and impact councils have should

not be diminished, nor outsourced to state or federal governments. The Council is well placed because it is comparably much closer to people and additionally has access to unique leavers of change.

2.3 Recommendation for how The Plan could better reflect the principle

The Plan commits to reducing the Council's operational emissions profile, yet there is much more the Council can commit to. Aligning mid-term targets to the state targets is a minimum (Data Driven Yale, PBL and New Climate Institute, 2018). In this way, taking inspiration from similarly positioned Councils can offer directions forward.

There are excellent resources and organisations that specialise in assisting councils to address their emissions. For example

- Climate Chance;
- Climate Active;
- ICLEI; and the
- Climate Change Exchange.

To highlight just one, Climate Active facilitates knowledge sharing across community groups, businesses and government. They provide ambitious actors with resources and accreditation to become leaders in addressing climate change.

The exact strategy a Council engages is unique to that Council's circumstance, however, there are useful lessons to learn from the experience of other Councils. Take for example Bayside City Council's Avoid, Reduce, Switch and Offset approach (ClimateActive.org, 2022). Bayside has been carbon neutral as of 2020.

Although carbon neutrality often necessitates the use of offsets and a carbon credit scheme, it is an important step in signalling Council ambition. With consultation with the above-mentioned organisations and community groups, the Council can develop a comprehensive and a more ambitious climate action plan.

2.4 Relevant section in The Plan

<u>The built environment</u>

The Plan correctly identifies critical challenges in the current planning codes and standards. This is a common issue facing councils throughout the country. The Plan identifies that the Local Environment Plan (LEP) and Development Control Plans (DCP) fail to appropriately respond to and accommodate to impacts of climate change.

Overall, the current LEP and DCP are limited in their ability to adequately respond to the impacts of climate change.

Changing from a disaster response paradigm to one that centres proactive preparation is critical. Introducing *mandatory* considerations for natural disaster risk and environmental sustainability into land-use codes takes ambition and courage. However, changes to the planning regime now will have long-lasting impacts into the future; and such, these considerations are perhaps the most important steps for local councils.

2.5 Recommendation for how The Plan could better reflect the principle

The RCNNDA as well as recent natural disasters have made clear that current planning regimes are inappropriate to the reality of climate change.

Significant changes in the way built environments are designed and plans implemented are already underway in some regions, like the Dubbo Regional Environmental Plan (2022).

The LEP and DCP are important tools for local Councils. And the Council, as a local plan-making authority, is empowered by the *Environmental Planning and Assessment Act 1979* to make changes to the LEP. The last edition of the LEP was published in 2012.

In consultation with community groups, and organisations such as the ones listed previously, we recommend that the Council commence a review into the current LEP regime with scope to focus on improving the environmental sustainability and resilience.

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