The Hon Ryan Smith MP
Minister for the Environment and Climate Change
44 New St
Ringwood VIC 3134

Email: vas.partnership@depi.vic.gov.au

3rd September 2014

Dear Minister Smith,

Re: Draft Climate Change Adaptation Memorandum of Understanding

The Eastern Alliance for Greenhouse Action (EAGA) welcomes the opportunity to respond to the Draft Climate Change Adaptation Memorandum of Understanding (MOU). EAGA is a formal Alliance of seven Councils in Melbourne's East, including:

- City of Boroondara
- Knox City Council
- Maroondah City Council
- City of Monash
- City of Stonnington
- City of Whitehorse
- Yarra Ranges Council

EAGA is committed to delivering mitigation and adaptation projects and advocating for initiatives that support sustainable, low carbon communities. We applaud the State Government for proactively engaging leaders within the Local Government sector on the critical issue of climate change adaptation and acknowledge the open spirit of collaboration that underpins the MOU. EAGA recognises that the existing lack of clarity around roles and responsibilities is one of the most serious barriers to adaptation and therefore support**s** the overall intention of the MOU. However, EAGA has a number of concerns with the *principles* as they are currently laid out in the draft document, specifically:

Informed decision making (Section 6, p3)

There appears to be a contradiction between the commitment made to informed decision making and the recent actions taken by the State Government to withdraw its support from Victoria's flagship adaptation research centre, the Victorian Centre for Climate Change Adaptation Research (VCCCAR). Access to robust empirical data and applied research is critical to the development of strategies to implement effective adaptation measures and reduce the levels of uncertainty in decision making for all agencies. Greater consistency between commitment and action will be a necessary precondition for the legitimacy of any formal agreement between the two spheres of Government.

Integrated decision making (Section 6, p3)

EAGA agrees that priority should be given to adaptation measures that deliver benefits at least cost to the community and that risks are often better managed by those closest to the risks. However, this may lead to the perverse outcome where a disproportionate amount of the costs may be borne by one of the parties, specifically Local Government. EAGA therefore urges the Government to revise this section of the MOU to address widespread concern that adaptation costs may be shifted to Councils from the State.

EAGA also has concerns regarding the *priority areas for future work*, specifically:

Resilience to extreme weather events (Section 7, p4)

The MoU does little to address the themes and priorities that emerged from the round table discussions as areas requiring clarification, for instance land use and strategic planning responsibilities and damage to public assets. Asset management is also an area where Governments are able to exert particular influence, for instance through more stringent standards on building design. EAGA requests that this be included as a priority area for future work.

Agricultural productivity and economic development & Vulnerable Communities (Section 7, p4)

The State also has particular influence over many economic development opportunities with tangible adaptation outcomes in Victoria's regions. Removing the regulatory barriers to renewable energy is a clear example where regions can benefit from direct investment and energy security. Similarly, a commitment to fast track the deployment of energy efficiency retrofit finance in the built environment can enhance the resilience of Victoria's buildings stock and create approximately $4.5B of investment and the creation of over 18,000 new jobs[1]. Assistance for vulnerable households to access energy efficiency and renewable energy solutions through rate based schemes is another key area where both levels of Government can collaborate to fast track the removal of regulatory barriers (for instance through changes to the Local Government Act).

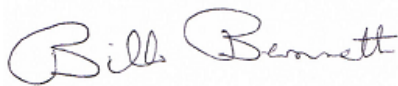[1] *EUAs for the Regions* (2013), http://eaga.com.au/advocacy/environmental-upgrade-agreements/

Community empowerment (Section 7, p4)

EAGA agrees that engaging and empowering the community is a critical factor in effective adaptation. However, the outcomes of a regional risk assessment for the EAGA region (a project funded through the Victorian Sustainability Partnership) reveals that many departments and service areas of some Councils have limited understanding and capacity to engage the community on climate change risks. Additionally, coordinating regional provision of information necessary to understand cross municipal risks is difficult as it is in addition to the existing scope of individual Council's service provision. However, the experience of Victoria's Greenhouse Alliances demonstrates that Councils can effectively fill their own knowledge gaps, coordinate and share regional information and provide forums to build capacity and expertise. Identification of role and responsibilities should therefore prioritise proven models and leverage these existing networks that enable both Councils and communities to engage and build shared capacity and deploy resources in the most efficient manner.

For the reasons given in this submission, we recommend that the MOU be further developed to provide greater clarity of roles and responsibilities and a framework and process for ongoing engagement between the levels of government.

EAGA is willing to work in partnership with the State Government and DEPI to ensure that equitable and consistent approaches to adaptation are adopted which represent the best value proposition for the community and all levels of Government.

Kind regards,

Cr Bill Bennett

Executive Committee Chair
Eastern Alliance for Greenhouse Action
Councillor, Whitehorse City Council