



29 August 2014

The Honourable Ryan Smith MP
Minister for Environment and Climate Change
8 Nicholson Street
East Melbourne VIC 3002

Dear Minister,

Re: Draft Climate Change Adaptation Memorandum of Understanding

The Northern Alliance for Greenhouse Action (NAGA), is pleased to provide feedback on the draft Memorandum of Understanding (MOU), which sets out the roles and responsibilities of the state and local governments with regards to climate change adaptation.

NAGA operates across the northern metropolitan region of Melbourne. NAGA's council members include Banyule City Council, Darebin City Council, Hume City Council, Manningham City Council, City of Melbourne, Moreland City Council, Moreland Energy Foundations Limited, Nillumbik Shire Council, City of Whittlesea and the City of Yarra. NAGA formed in 2002 to share information, coordinate emission reduction activities and cooperate on research and the development of innovative projects. NAGA's goal is to achieve significant emissions abatement and energy cost savings by delivering effective programs and leveraging local government, community and business action.

NAGA welcomes the opportunity provided in the MOU to clarify the roles of the different levels of government, and offers the following feedback with a view to improving the effectiveness of the MOU:

- Meeting the principle of informed decision making needs to be supported by appropriate structures for local government. Councils covered by regional greenhouse alliances, such as NAGA, already benefit from this in being able to learn from outside experts and share best practice to be applied at the local level. Recognition of the role of alliances in the MOU would assist in continuing this work.
- This principle should also support the provision and coordination of high quality research which will help inform good local decision making. In this light, the ending of funding for the Victorian Centre for Climate Change Adaptation Research (VCCCAR) is a retrograde step. Adaptation is an ever evolving process in line with the understanding of climate change as a wicked problem which has no end date. Continuing research through VCCCAR will provide a sound basis for local and state government policy and program development.

MEMBER ORGANISATIONS

BANYULE CITY COUNCIL, DAREBIN CITY COUNCIL, HUME CITY COUNCIL, MANNINGHAM CITY COUNCIL, CITY OF MELBOURNE, MORELAND CITY COUNCIL, MORELAND ENERGY FOUNDATION LIMITED, NILLUMBİK SHIRE COUNCIL, CITY OF WHITTLESEA, CITY OF YARRA

The views represented in this submission do not necessarily represent the views of all NAGA members individually.

- The timeframe for the development of the work plan associated with the MOU appears ambitious, if the MOU is to delineate clear responsibilities in each of the priority areas. Currently, the timeline for the development of the work plan runs from late 2014, when this MOU is agreed and signed, to January 2015. This would appear not to allow sufficient time for genuine consultation with local government.
- The capacity of local government to adapt to climate change varies substantially across the sector. Within NAGA, four councils currently have climate change adaptation plans while others are working through a current Victorian Adaptation and Sustainability Partnership funded project, developing a regional vulnerability assessment which can form the basis of a regional or independent council adaptation plans. This variance in capacity extends across the state and needs to be reflected in supportive arrangements detailed in the work plan, and in funding to support actions set out in the work plan. Local government is naturally wary about any increase in responsibilities required to adapt to climate change, without funding that reflects that increase.
- NAGA seeks greater clarification on how the MOU will operate over time and whether there will be additional opportunities for input. Ensuring the Ministerial Advisory Committee is responsive to local government through a clearly structured process, will be required to ensure that councils support the ongoing implementation of the MOU.

Finally, NAGA would stress that adaptation and mitigation are complementary and necessary responses to climate change. Implementing adaptation measures with limited or no mitigation will only increase the overall risk that must be considered and the scale and cost of those adaptation measures. In this respect, we believe it is crucial that both state and local governments in Victoria continue and expand climate change mitigation measures, to ensure the greater likelihood of success of adaptation responses.

Please contact me (phone: 9385 9505 or email david@mefl.com.au) if you would like further information, or any clarification regarding the issues raised in this letter.

Yours sincerely

A handwritten signature in black ink, appearing to read 'D. Meiklejohn', with a long horizontal line extending to the right.

David Meiklejohn
Executive Officer

Northern Alliance for Greenhouse Action.