

30 July 2015

Climate Change Act Review Secretariat
Department of Environment, Land, Water and Planning
PO Box 500
MELBOURNE VIC 8002

By email: climatechange.act@delwp.vic.gov.au

Dear Secretariat,

Re: Review of the *Climate Change Act 2010*

The Property Council is pleased to comment on the review of the *Climate Change Act 2010*.

We represent Australia's property and construction industry which comprises the developers, investors, owners and managers of property, as well as the professional and trade services working in the industry.

The Property Council is supportive of the *Climate Change Act 2010* review. Our members have a longstanding commitment to sustainable development and we recognise that the property industry has an important role to play in improving the resilience of buildings going forward.

Tools and information for adaptation planning

As noted in the Victorian Climate Adaptation Plan, government policies can influence and support private sector adaptation, by providing 'timely and accessible information to support businesses manag[ing] their own risks'.

The Property Council supports this view, and believes that ready access to information is essential for building owners to be strategic in making their assets more resilient.

Unfortunately, most climate projections produced by government are not suitable for use as a basis for technical modelling or estimates by industry. This has led to uncertainty around how industry interprets future weather scenarios and potential risks for building designs.

Tools which can synthesize climate change scenarios, regional risks, weather and location specific data for use in building design will help practitioners understand the implications of climate change for their area and develop strategies accordingly.

There are already many examples of this. Cal-adapt, a web-based adaptation tool developed by the California Energy Commission, allows users to render climate projections and impacts in specific geographic areas throughout the state, in a way that can be used to inform building design and asset management.

Another example is the weather and climate change data sets produced by the Chartered Institution of Building Services Engineers with the UK Government and consulting engineering firm

Arup. These valuable climate files can be used by designers to test building designs under current climate conditions, as well as those likely to occur in future decades.

The industry would welcome a local tool in a similar vein to these above examples.

Government leadership

Climate change adaptation should be considered prudent risk management, by helping to protect business continuity and asset value while mitigating the related societal costs.

To promote best practice across the business and wider community, the public sector should lead by example to make adaptation strategies a key part of government activity. This can be achieved through:

- Developing climate adaptation plans for government assets;
- Working with owners of government leased properties to improve resilience, especially in areas projected to be more prone to the impacts of climate change (e.g. extreme weather events, sea level rises);
- Ensuring that government procurement activities recognise and address the potential impacts of climate change and,
- Requiring unsolicited proposals from the private sector to consider climate risk for projects and services.

Resources are available to assist with this such as the Australian Standards 5334 – Climate Change Adaptation for Settlements and Infrastructure, which promotes the integration of climate change considerations into decision making processes. A key benefit of introducing nationally recognised standards is that they establish a common language and as such, improve consistency across government procedures.

Reducing green tape

While the Property Council recognises the need for some local governments to implement separate solutions to climate change impacts, we believe there must be an over-arching level of harmonisation in the development of these responses.

Many of our members operate in several local and state government jurisdictions. The lack of consistency in adaptation responses is not only inefficient and costly, but can also stifle innovation by creating uncertainty for private investors.

The Review should seek to set a clear and consistent state wide policy which promotes a whole of government approach to climate change adaptation. This involves coordinating with other tiers of government, particularly with regards to emergency management planning. In South Australia, for example, when funding Integrated Regional Vulnerability Assessments, the Government establishes a State Government Advisory Group to assist local government access to information and insights required to undertake a robust and consistent assessment. Engagement with the

private sector is also crucial, in order to leverage existing expertise and identify efficiency gains which can help to reduce the cost of adaptation.

The Property Council welcomes any further opportunities for involvement in the review of the *Climate Change Act 2010*. Should you have any questions relating to our submission, please feel free to contact Sandra Qian, Policy Advisor on 9664 4220.

Yours sincerely,

A handwritten signature in blue ink, reading "Jennifer Cunich". The signature is fluid and cursive, with the first name "Jennifer" being larger and more prominent than the last name "Cunich".

Jennifer Cunich
Victorian Executive Director
Property Council of Australia

