



The South Australian Council of Social Service (SACOSS)
Submission to
Prospering in a Changing Climate
—A Draft Climate Change Adaptation Framework for South Australia
Draft Submission for Community Consultation
December 2010

April 2011

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Scope of interest

The South Australian Council of Social Service (SACOSS) is the peak body for social services in South Australia, and is an independent non-government organisation with a sixty year history of advocating for disadvantaged and vulnerable South Australians. SACOSS is a not-for-profit independent organisation whose members represent a wide range of interests in social welfare, health and community services. SACOSS is part of a national network assisting low income and disadvantaged people, and shares with its members the vision of *justice, opportunity and shared wealth for all South Australians*.

In its role as a peak body for community services in South Australia, SACOSS covers a broad range of policy areas including the impacts of disadvantage on the most vulnerable South Australians. In recent years SACOSS has led or participated in debate and advocacy in the areas of consumer credit, electricity and gas, telecommunications, water management, financial counselling, payday lenders, food security, and gambling.

SACOSS' interest in the Government of South Australia's Climate Change Adaptation Framework is based on the needs of vulnerable households and the health and economic implications of a changing climate and extreme weather events.

SACOSS is of the view that the sector is already a key pillar in maintaining and enhancing *resilience* at a household and community level—providing, with governments and others, a 'safety net' for the most vulnerable in society. The impacts of climate change will most likely provide further challenges to this work and this will ensure climate adaptation is a strategic priority for SACOSS for the foreseeable future.

While SACOSS is well positioned to take a lead role in supporting climate change adaptation amongst the vulnerable and disadvantaged, it is essential to recognise that the health and community services sector generally has a low level of engagement with the concept of climate change. An enhanced role for SACOSS in engaging, facilitating and role modelling adaptive behaviours and practices is therefore essential to enable all sections of the South Australian community to successfully adapt to climate change.

Key Message

Climate change adaptation is largely about identifying and addressing vulnerabilities and enhancing resilience. SACOSS contends that the health and community services sector *modus operandi* is just that—supporting the vulnerable and building resilience to life challenges. The sector is well placed to add growing climate risks to the issues on which it relentlessly responds. However, at this point in time there is a low level of connection with the concept of climate change within the sector. Thus the sector needs help to understand in very practical ways the roles it can play and functions it can have in adapting to the impact of climate change. The sector remains a critical pathway to access members of the community who otherwise would be overlooked, or may not see themselves as needing to adapt to climate change.

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Introduction

SACOSS hosted a consultation workshop on 1 April 2011. The workshop allowed for a presentation of the state government's *Draft Climate Change Adaptation Framework for South Australia: Draft Submission for Community Consultation* (the *Draft Framework*) and a discussion of issues from the health and community services sector. As best as possible, the views and issues raised at the workshop have been incorporated into this submission.

Observations

It is important that climate change is not treated as a stand-alone issue for the sector. Climate change represents a change in the context of the existing activities of the sector. Largely, the impacts of climate change will manifest in changes in the frequency and extent of demands on the sector. It is not likely to present any 'new' demands per se.

It is therefore important for the sector's engagement with the *Draft Framework* to make maximum use of existing networks and activities. Existing, regional networks include those related to anti-poverty, emergency relief, financial counselling, and local government community services forums.

It was also felt that consideration of 'community health and individual wellbeing' corresponded to the 'social' element of the traditional triple-bottom line of sustainability. This element is, arguably, the least well represented and understood of the three—with the sustainability journey to date largely dominated by environmental conservation vs economic development debates: trees, critters and dollars, but not so much about people.

Segmentation in the Draft Framework

SACOSS understands and accepts the need to segment the economy and society as part of developing a management framework for something as complex and pervasive as climate change. SACOSS supports the use of a region-based segmentation as the primary basis of the proposed approach. SACOSS is also of the view that, as a peak representative body, it has a role in the implementation of climate change adaptation strategies in the regions.

It was felt that the SACOSS sector of interest overlapped a number of the sectors identified in the *Draft Framework*. For example, affordable and sustainable housing is relevant to 'Infrastructure and the built environment'; the sector already has a frontline role in 'Emergency Management'; the sector's undertakes vital work in service delivery and policy advocacy related to 'community health and individual wellbeing', as well as in trying to ensure affordability and access to utilities such as energy and water.

In its own work on climate change, SACOSS is compelled to consider further segmentations of the issues:

- Impacts of changes in weather patterns (ie the meteorological climate) AND impacts of changes in the economic climate
- Impacts on organisations in the sector AND impacts on individuals supported by the organisations in the sector
- Representing the needs of organisations that are direct service providers AND organisations that advocate for individuals and issues.

Other segments/issues/themes not explicitly recognised in the *Draft Framework* include:

- Transport
- Food security
- Cost of living and affordability
- Health
- Urban planning

Roles

It was stated at the consultation workshop that specific feedback was being sought on 'Roles and Responsibilities'.

The stated roles for the three levels of government understate the role of governments in service delivery and, consequently, government roles in outsourcing service delivery to organisations in the health and community services sector.

Section 1.4.2 of the *Draft Framework* refers to 'Private Parties'.

It states:

Individuals, communities and businesses will primarily be responsible for managing the risks to private assets and incomes and the benefits they receive from doing so are a strong incentive to act. These private parties will have a particular interest in maintaining the vibrancy and longevity of regional economies and will therefore play an important role in developing local adaptation responses.

SACOSS is not convinced this adequately represents the roles and issues for the not-for-profit delivery of health and community services. It is arguable that the sector is already a key pillar in maintaining and enhancing resilience at a household and community level—providing, with governments and others, a 'safety net' for the most vulnerable in society. The impacts of climate change will most likely provide further challenges to this work.

Table 4 in the *Draft Framework* (p. 56) lists 'Major Roles' for implementing the framework. NGOs and Businesses are identified as having major roles of:

- Working with other key partners to deliver relevant statewide actions
- Working with regional partners to develop regional IVAs – see Part 3
- Working with regional partners, and local communities and sectors to develop regional adaptation plans

SACOSS can see a key role in the development of regional Integrated Vulnerability Assessments (IVAs) and regional adaptation action plans. This role would either be a direct one, or indirect by providing resources and support to sector representatives in the regions.

There is an emergent role in the preparation of materials and evidence of the vulnerabilities in the sector that are applicable in each region. The development of shared and adaptable resources is a key role that SACOSS can play in the implementation of the Climate Change Adaptation Framework.

SACOSS is keen to develop this in consultation with the Government of South Australia, and to work with them to attract external funding and resources to the initiative. A systemic, methodical approach to understanding risk and vulnerability in the sector, at a regional scale, is expected to be of high order strategic importance to SACOSS as the peak body and for the sector overall.

Another key role for SACOSS is to develop educational materials on the practical implications of climate change, and the potential for adaptation, for the sector.

Underscoring the role of SACOSS is the reality that there is a low level of connection within the health and community services sector about how climate change adaptation issues will impact on their operations and clients. The sector needs help to understand the way in which it can adapt to climate change. SACOSS is uniquely placed to illustrate the practical implications, to role model appropriate behaviours and practices and to strategically guide the sector through action, research and advocacy. The fact that a vast number of people are already accessed by the sector – including organisations, members, clients and supporters – provides a real opportunity for influencing the behaviours and practices of a significant proportion of the population.

Adaptation Capacity = Financial Capacity?

To quote the *Draft Framework*:

Page 9: Likewise, climate change will have direct and indirect impacts on our health and wellbeing, particularly for vulnerable members of the community, such as the elderly, those who live in remote settlements, the sick and people on low incomes. Health and community services will be affected across the state.

Page 22: Objective 4 Resilient, healthy and prosperous communities
... will also require us to pay attention to the needs of the most vulnerable members of society, including the elderly, young children, and those who live in remote or highly vulnerable coastal communities.

Page 30: ... Those South Australians who are least economically equipped to move or adapt their living conditions are likely to be the hardest hit, such as elderly people, Aboriginal communities, those with a disability, young children and those on low incomes.

... Human and social capital is a key determinant of adaptive capacity and is as important to climate change adaptation as levels of income and technological capacity.

SACOSS is of a similar view: that an individual's financial circumstances are a key determinant of vulnerability and resilience. As such, SACOSS is of the view that affordability of basic needs and essential services is an under-represented theme in the *Draft Framework*. Health, housing, food, energy, water and transport are all likely to be impacted by aspects of climate change (in terms of both weather patterns and economics) and a key criteria for appropriate adaptation responses must be in relation to the affordability of these needs.

The forecast changes to the local climate to one that is hotter, drier and witness to more extreme events will present even greater challenges to the more vulnerable members of our community. The transition to a low-emission economy will likely see an increase in energy and water prices as part of a push for a less resource-intensive consumption economy. Many low income households are often extremely limited in their ability to access the energy and water efficient technologies that can contain costs as prices rise.

Further, it is apparent that housing is a key determinant of resilience to both a more aggressive climate and to higher energy and water costs.

No Regrets

SACOSS would also like to emphasise the importance of NO REGRETS actions—those actions that are worth doing whether there is a significant shift in the climate or not. Energy efficiency is a

key 'no regrets' action. In a housing context, 'eco-affordable' housing¹ is a growing movement that provides, simple, climate appropriate housing with very low running costs. Expanded public transport can also reduce greenhouse emissions while reducing the cost of living.

It is felt that this should be further expanded in the Climate Change Adaptation Framework and in the resources made available to regions.

Existing initiatives

SACOSS would like to make DPC aware of two existing initiatives related to energy consumption in hot weather:

- ESCOSA no disconnections during heatwaves policy www.escosa.sa.gov.au/projects/155/heatwave-disconnections-policy-post-implementation-review-.aspx
- Keeping Cool campaign (Appendix One) www.sacoss.org.au/campaigns.htm

¹ For example, see www.adelaidecitycouncil.com/development/major-projects/whitmore-square-affordable-ecohousing.html

Appendix One

KEEPING COOL SA CAMPAIGN PLATFORM

The Need for a Medical Cooling Energy Concession in SA

The Keeping Cool Alliance has been formed to campaign for a Medical Cooling Rebate for South Australians with medically based "heat intolerance".

People with medically based heat intolerance (who are often on low incomes) spend up to seven times as much as the average South Australian on air-conditioning.

Approximately 1300 South Australians suffer from medically based heat intolerance. It is associated with a wide range of conditions including MS, Parkinsons, Poliomyelitis and Post-polio syndrome, Quadriplegia, Muscular Dystrophy, Motor Neurone Disease, Cerebral Palsy, Fibromyalgia, Systemic Lupus Erythematosus, Chronic Fatigue, Lymph oedema and Scleroderma.

Every other State except Tasmania provides a medical cooling rebate to help people cope with their medical need for cooling.

The alliance is proposing a Medical Cooling Rebate for South Australia as follows:

- A rebate of approximately \$210-280 per annum or about one third of the average air-conditioning bill of people with 'medically based heat intolerance' in South Australia
- As with the current energy concession only people on low incomes would be eligible but a doctor's sign-off on the 'medical need' for cooling would be required.
- The rebate should either be flat annual rate indexed annually to residential electricity tariffs or alternatively a percentage-based rebate could be established.

The alliance believes that a Medical Cooling Rebate would be a low cost-initiative. Based on the Victorian experience the rebate would cost approximately \$100,000, in the first year of operation rising to between \$400,000 to \$500,000 in five years. and then leveling off as uptake stabilises.

The membership of the Keeping Cool Alliance is growing rapidly and currently includes:

SACOSS	CARERS SA
MS SA/NT	MUSCULAR DYSTROPHY SA
PARKINSONS SA	MOTOR NEURONE DISEASE ASSOCIATION OF SA
NATIONAL DISABILITY SERVICES	LYMPHOEDEMA SUPPORT GROUP SA INC
BRAIN INJURY NETWORK OF SA	THE EPILEPSY CENTRE
PARAQUAD SA	HEALTH CONSUMERS ALLIANCE

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