



Submission to the National Adaptation Plan Issues Paper

April 2024



Jesuit
Social Services
Building a Just Society

Jesuit Social Services: Who we are and what we do

Jesuit Social Services has been working for more than 45 years delivering support services and advocating for improved policies, legislation and resources to achieve strong, cohesive and vibrant communities where every individual can play their role and flourish.

We are a social change organisation working with some of the most marginalised individuals and communities, often experiencing multiple and complex challenges. Jesuit Social Services works where the need is greatest and where we have the capacity, experience and skills to make the most difference. Our services span Victoria, New South Wales and the Northern Territory where we support more than 57,000 individuals and families annually.

Our service delivery and advocacy focus on the following key areas:

- **Ecological justice** – inviting discussion on what practices, policies and actions can be taken by governments, individuals, organisations and the community services sector within Australia, to build an ecologically just society. This includes the Centre for Just Places, and place-based work in the Northern Territory, Western Sydney and Victoria
- **Justice and crime prevention** – people involved with the justice system
- **Mental health and wellbeing** – people with multiple and complex needs including mental illness, trauma, homelessness and complex bereavement
- **Settlement and community building** – recently arrived immigrants and refugees, and disadvantaged communities
- **Education, training and employment** – people with barriers to sustainable employment
- **Gender Justice** – providing leadership on the reduction of violence and other harmful behaviours prevalent among boys and men and building new approaches to improve their wellbeing and keep families and communities safe.

Research, advocacy and policy are coordinated across all program and major interest areas of Jesuit Social Services. Our advocacy is grounded in the knowledge, expertise and experiences of program staff and participants, as well as academic research and evidence. We seek to influence policies, practices, legislation and budget investment to positively influence people's lives and improve approaches to address long term social challenges.

We do this by working collaboratively with governments, business and the community sector to build coalitions and alliances around key issues and building strong relationships with key decision-makers and the community. Our Learning and Practice Development Unit builds the capacity of our services through staff development, training and evaluation, as well as articulating and disseminating information on best practice approaches to working with participants and communities across our programs.

We acknowledge the Traditional Custodians of all the lands on which Jesuit Social Services operates and pay respect to their Elders past and present. We express our gratitude for their love and care of people, community, land and all life.

Executive Summary

Jesuit Social Services welcomes the opportunity to respond to the Climate Adaptation in Australia - National Adaptation Plan Issues Paper, led by the Department of Climate Change, Energy, the Environment and Water.

Climate change threatens the lives, quality of life and human rights of everyone in Australia and globally. As an organisation that works in climate justice, ecological justice and place-based disadvantage, we remain concerned about the impact of rising temperatures, higher risks of catastrophic weather-related events, including bushfires and floods, and the risks these pose for communities who are least able to respond to the impacts of climate change. Such groups include people experiencing poverty, First Nations peoples, people with existing health issues and future generations.

We strongly support the need to establish a long-term Climate Adaptation Plan to support all Australians, particularly our most affected communities in responding to climate change impacts. Jesuit Social Services maintains that the most effective way to mitigate the impacts of climate change is ongoing action that addresses the real causes, as well as enabling local communities to respond proactively to current and emerging risks. Without both universal and local action, the impacts of climate change will continue to affect those that are the most vulnerable. This requires legislative and structural change, ensuring at a minimum that Australia achieves its international responsibilities including being in line with the Paris Agreement.

A Climate Adaptation Plan, developed through place-based and community-led approaches, must therefore be undertaken concurrently with action to directly address climate change.

Jesuit Social Services' Response to the Consultation Survey Questions

1. What do you think a well-adapted and resilient Australia looks like?

1.1 Australia's economy, society, and natural and built environments are being managed and invested in, to reduce climate impacts and harness any opportunities now and into the future – by all levels of government, business and community.

On a scale of 1 to 5, with 1 indicating that you completely disagree and 5 indicating that you fully agree, does the draft vision capture this?

(Completely disagree/Neither disagree nor agree/Completely agree)

Score 2 (disagree)

1.2 Why or why not?

While Jesuit Social Services commends the Australian government's commitment in developing this Issues Paper and National Adaptation Plan, a more ambitious vision is required to urgently and equitably protect and support individuals, communities, organisations and natural systems.

Jesuit Social Services strongly supports a vision that aspires to go beyond just reducing climate impacts, to creating thriving, healthy, fair, safe and sustainable communities and environments. Through the application of a justice lens, this vision should articulate the opportunity for the National Adaptation Plan to transform and redress existing structures and systems that create and sustain the inequities and injustices unevenly impacting adaptive capacity for people and places.

Climate adaptation and resilience require a more proactive approach and not just "being managed and invested in". A just adaptation is about recognising and building on the strengths of communities. The vision should include more strengths-based and social justice driven terminology of what we would like to see in Australia, such as 'thriving communities', 'justice', 'fairness', or 'equality'.

1.3 The key objectives of the National Adaptation Plan are to 'mainstream' adaptation action, drive a substantial uplift in private sector investment and establish support for people and communities in disproportionately vulnerable situations. Considering and managing climate risk will become part of business-as-usual for governments, organisations and communities across Australia.

On a scale of 1 to 5, with 1 indicating that you completely disagree and 5 indicating that you fully agree, do you agree with the key objectives of the plan?

(Completely disagree/Neither disagree nor agree/Completely agree)

Score 3 (neither agree or disagree)

1.4 What other suggestions do you have?

Jesuit Social Services agrees that adaptation action needs to become an integral part of the way in which Australia is preventing and mitigating the impacts of climate change on people, communities and natural systems. While we strongly support the key objective that emphasises a focus on "people and communities in disproportionately vulnerable situations",

further detail is required to understand this approach. For example, the objective should include more detail on how “vulnerability” is defined, assessed and measured as well as what types of “support” will be offered. We also believe a key objective needs to include addressing structural factors that cause this vulnerability.

“Uplift in private sector investment” also needs to also be more defined as a key objective. This should involve more specific measures and regulation of businesses and their activities, considering the potentially significant impact on people, communities and the environment. This involves legislative change, for instance to establish minimum standards for Australian housing regulations requiring both heating and cooling in rental properties, and incentives to retrofit private rental properties. This would also address structural disadvantages for people and communities in disproportionately vulnerable situations.

Jesuit Social Services would like to highlight the integral role of the community sector in supporting communities in disproportionately vulnerable situations. Community service organisations play a key part of the social infrastructure required to build climate adaptation and resilience, through both their close connections to community and their roles in addressing social inequality. They also have a strong understanding of the local needs, drivers of risk, and vulnerabilities for communities. Furthermore, community service organisations themselves are also vulnerable to the impacts of climate change, creating further risk in their ability to provide essential services and programs to vulnerable communities (e.g. housing, legal services, justice, family violence etc.). Therefore, it will be critical for the National Adaptation Plan to ensure adequate support is provided to community services and sectors directly supporting communities in disproportionately vulnerable situations.

2. The plan will respond to the priority nationally-significant risks identified in the National Climate Risk Assessment. Within those, what areas should be the Commonwealth’s priority for this first National Adaptation Plan and why?

N/A

3. What is working well in adaptation policy governance at the national level? Are there more opportunities for collaboration, or institutional changes that will help build a more adapted Australia?

A more adapted Australia needs to be built through a ‘just adaptation’ model. As part of this, it requires a collaborative and place-based, community-led approach. Genuine community consultation is needed at every stage of this process, to ensure it is most effective and just in building climate resilient Australian communities. This includes increased collaboration with community service organisations, who work daily with affected communities and are aware of both the unique needs as well as the strengths of the community that can be fostered. Part of addressing structural barriers in a climate resilient approach requires the federal government to increase investing in more programs of ecological literacy for marginalised communities and individuals to increase engagement, employment prospects and livelihoods be funded and implemented particularly in disproportionately vulnerable communities.

4. How should adaptation success be measured?

A just adaptation should be measured by the achievement of thriving, healthy, fair, safe and sustainable communities and environments. The Issues Paper recognises that there are people and communities that are most impacted or 'vulnerable' to climate change. For instance, exposure to both high and low temperatures is a much greater risk for more vulnerable population groups including those with existing health issues, disabilities, elderly people, children and people experiencing homelessness.¹ Communities most impacted by climate change also often have the least capacity to mitigate climate change impacts. This includes economic disadvantages such as being unable to afford heating or cooling, or a home that is not equipped to handle extreme Australian temperatures.²

As such, adaptation success needs to be looked at through a human rights lens. We can only consider a just adaptation successful if those most affected still have acquired a standard of living and achieved a quality of life where their health, wellbeing and at times mortality is not significantly impacted by climate change. Further, that success is not only measured from achieving a minimum standard and seeks to go beyond that. This requires a proactive and urgent approach to mitigate the root causes of climate change.

Secondly, it is inevitable that weather events, both disasters and slow onset events, will continue to occur. As such, the success of mitigating these impacts must involve putting measures, strategies and services in place for communities. Community preparedness, allocation of resources for local mitigation strategies, evidence of planning structures across all levels of government in concert with local community service organisations would all be key markers of adaptation. Having these structures in place will have the potential to reduce the impact of a weather event or climate disaster on communities.

Thirdly, adaptation success should not only be measured through outcomes, but also through the processes of how adaptations are executed. For instance, are First Nations peoples and communities involved in decision-making and the design of adaptation and resilience strategies? Are place-based approaches being implemented, and the strengths of communities fostered as part of this national plan?

5. What time horizon should the National Adaptation Plan cover?

This will be Australia's long term National Adaptation Plan, as such the timeframe must also be long term. The Plan should at least be in line with Australia's responsibilities under its Paris Agreement Commitments, i.e. meeting net zero emissions by 2050. Further, within this timeframe it should be staged as short-term (e.g. next 2-3 years), medium-term (2030, in line with Paris Agreement 2030 targets) and long-term planning (to 2050). However, to ensure that the Plan is effective and accurate within this timeframe and beyond, the Plan needs to be a framework that can be re-evaluated on a regular basis, for instance every 5 years in line with other countries, as suggested in the Position Paper. This re-evaluation should include a Climate Risk Assessment.

¹ Hughes, L., Hanna, E., & Fenwick, J. (2016). The Silent Killer: Climate Change and the Health Impacts of Extreme Heat. Climate Council of Australia. ([Weblink](#))

² Jesuit Social Services (2023). Jesuit Social Services' submission to the National Housing and Homelessness Plan. Pp. 13-16. ([Weblink](#))

6. The following draft principles could provide a framework for prioritising adaptation actions, preferencing those that:

- Are ‘no regrets’ actions. These could be because they are addressing impacts expected with high likelihood in the next decade or have co-benefits (such as reducing emissions or reducing inequality)
- Are the first part of an effective adaptation pathway. That is, they manage the impacts expected in the short term, but are deployed in a way that makes it easier to respond to greater risks in future
- Are key enabling actions for others. For example, the provision of next generation regional climate projections, or guidance to support effective climate risk management
- Drive action to strengthen adaptation across multiple sectors or regions
- Promote consistency across the country, while allowing for local differences, including contexts and priorities
- Assist groups who are being disproportionately affected by climate impacts and ensure that adaptation addresses equity and human rights, such as gender-responsive adaptation, intergenerational equity and equity for people with a disability.

On a scale of 1 to 5, with 1 indicating that you are completely against the draft principles and 5 indicating that you fully support them, do you support the draft principles for prioritising and sequencing adaptation actions over time?

(Completely disagree/Neither disagree nor agree/Completely agree)

Score 3 (neither disagree or agree)

6.1 Why or why not?

We support the principle for the need to make immediate ‘no regrets’ actions based on mitigating the most urgent short-term impacts of climate change on people, communities and environments. However, the principles need to have greater emphasis on priorities for long-term adaptation actions and resilience as well – actions and planning need to continue after the short-term priorities are reached. While adaptation and building resilience is required at all levels and in public, private and non-governmental sectors, a principle must include the need for structural change to address the disproportionate impacts of climate change on our most affected communities.

Close collaboration with communities and community service organisations is a vital part to the success of climate adaptation and building resilience of communities, however this is not specified anywhere in the principles. Rather than aiming to just “assist” groups who are disproportionately affected...”, principles of strengths-based approaches with communities also need to be included. Communities, including First Nations, hold vast knowledge and expertise in environment, climate adaptation and in the needs and strengths of their own communities.

We strongly support the inclusion of human rights and equity principles, however there are other principles that should also be included, such as a requirement for ‘place-based approaches’ and ‘just transitions’. Principles in line with Australia’s international responsibilities in climate change mitigation and adaptation would also be vital.

6.2 Are there any gaps? If so, please describe.

The identified gaps in the principles that Jesuit Social Services recommends being incorporated includes:

1. Greater emphasis on long-term prioritisation of adaptation actions
2. Structural change to address the systemic disadvantage leading to disproportionate impacts on communities most impacted by climate change
3. Strengths-based and community-led practices, including a strong collaboration with communities and community service organisations
4. Responsibility of government on a national level in leading and implementing climate adaptation and resilience including in ensuring human rights and equity
5. Incorporating social justice approaches in addition to human rights and equity principles – including ‘place-based approaches’ and ‘just transitions’

System sections

7. Select which systems you would like to answer for:

Health and social support system

8. What other existing policies are supporting adaptation for this system?

The majority of existing policies have been outlined in the Issues Paper. Further to the policies already listed, the Victorian Government has developed the [Health and Human Services Climate Change Adaptation Action Plan 2022–2026](#), one of 7 plans across statewide systems.

We support the Issues Paper’s recognition of the broad range of policy levers that sit within other systems and sectors and their influence on positive health and social outcomes as well as on climate resilience. To support and embed health and social equity in adaptation efforts, a Health in All Policies approach should be undertaken and embedded in policies and strategies within all systems, sectors and levels of government.

9. Who should be undertaking action to strengthen adaptation action in this system?

There is a responsibility from across multiple sectors, including all levels of government, to enable and support adaptation action within the health and social support system. This action should include a combination of ambitious national approaches that are strongly supported by place-based and community-led adaptation action.

While we support the Issues Paper’s acknowledgement of the need to build the resilience of the healthcare services and workforce, there is limited recognition or explicit mention of the integral role of the community services sector in adaptation, reducing risk, and building climate resilience for people and places experiencing disproportionate vulnerability. Together, community health and community service organisations play a critical role in building resilience to the social and health impacts of climate change. Without the resources to plan and adapt however, the sector itself is highly vulnerable to climate impacts, posing a risk of significant flow-on-effects for the communities they

support.³

In 2022, Jesuit Social Services' Centre for Just Places, together with over 20 community health and service organisations across Victoria ([Resilience Community of Practice](#)), called upon the Victorian Government to support adaptation action in the community service and health sector, including the following recommendations:

1. Establish a Community Sector and Community Health Climate Adaptation Fund and corresponding Action Plan to support community service and health organisations to trial, implement and embed into services and programs
2. Provide opportunities for professional development for workforce and leadership, across climate change literacy, organisational resilience planning, and understanding the critical role that community services and health organisations can and do play in building community resilience
3. Centralise and enable public access to data and information that help community organisations and communities to better plan for climate change, including information about social and health inequities, climate risks, social infrastructure and health services
4. Consult with community service and health organisations to define and strengthen pathways to inform government decision making, and resource organisations to utilise their community connections and enable inclusion of diverse stakeholders in the development of government adaptation and health and wellbeing planning

Many of these recommendations have relevance at a federal level and should be considered in the context of a National Adaptation Plan.

11. What policies could be strengthened or added as the highest priorities?

National adaptation efforts within the health and social support system could be strengthened through a commitment to funding the implementation of the National Climate Change and Health Strategy, in addition to investment in preventative health and social infrastructure outside of the healthcare system that addresses the underlying drivers of climate vulnerability and health inequity.

12. What measurement and evaluative tools and processes should be implemented to track adaptation progress for this system?

N/A

Specific questions for the First Nations' values and knowledges system

13. What are some examples of First Nations-led adaptation action and partnerships?

First Nations peoples across the globe are known to be remarkably resilient in the face of adversity, and in Australia, First Nations peoples are leading some of the most important adaptation actions. Among these are the First Nations Clean Energy Network and the Indigenous Carbon Industry Network, both of which are focused on adaptation to a clean energy future. Organisations such as the

³ Jesuit Social Services (2023). Mobilising Climate Just and Resilient Communities in Melbourne's West: Collaborative Action Plan. Centre for Just Places. In Collaboration with Lord Mayer's Charitable Foundation. ([Weblink](#))

Lowitja Institute are also leading the way in climate change policy and adaptation strategy; Lowitja are looking to establish the National Indigenous First Nations Climate and Health Alliance.

At the grassroots level, there is a multitude of actions and partnerships taking place. Indigenous ranger groups facilitate Care for Country across Australia. Blue carbon opportunities are being adopted by local communities, and other Paid Ecosystem Services (PES) models operate on Country. Community action groups have also been established across Australia, with an aim to call out unwanted fossil fuel projects, instead calling for genuine adaptation and transition planning – for example, in 2019 the Central Australian and Barkly Aboriginal Climate Justice Alliance was established to advocate for social and environmental justice, and for just transitions that do not involve fracking for gas in the Beetaloo Basin or the Barossa ‘gasfields’ of the Northern Territory.

13.1 How can these actions and partnerships be better supported?

For many Aboriginal Controlled Community Organisations, resourcing is a key challenge. First Nations peoples frequently have competing family and community obligations, and many First Nations-led organisations struggle under the weight of limited time, infrastructure, finance, and capacity. Adaptation actions and partnerships need to be authentically led by First Nations peoples, not just tokenistically – and this means ongoing resourcing (financial and human), and capacity building. It also means that non-Indigenous peoples working in partnership with First Nations peoples must be culturally literate and respectful of Indigenous Ways of Knowing, Doing, and Being. It is important to understand that it takes time to build genuine relationships and to overcome the many historic failed attempts to engage Community, which have left First Nations peoples and communities sceptical and less likely to be part of the conversation.

There also needs to be more awareness of the concomitant issues affecting these organisations – alongside resourcing and family and community obligations, climate change is having a direct impact on infrastructure and liveability, particularly in northern Australia. Extreme heat and extreme weather events make day to day life more challenging and place further stress on people who are already subject to social justice issues such as water insecurity and energy poverty, and the everyday tasks of community building and environmental resilience work become even more challenging.

14. Along with First Nations peoples, who should be undertaking action to strengthen First Nations-led adaptation action and partnerships?

Jesuit Social Services’ commitment to ecological justice sees First Nations peoples’ Care for Country and social responses as inextricably linked. Ecosystem vulnerability illustrates the need for building community resilience that is proactive in protecting our common home. The threat of climate change and the need for healthy relationships with our environment are integral to the long-term concerns in these times of multiple stressors. Given these compounding disasters, hazards and threats, we need to ensure that our institutions and social, justice, environmental management and economic systems are resilient for all in our communities.

This requires a holistic approach, that is both top down and bottom up. Locally led governance models, particularly in places like the Northern Territory, ensure that place-based approaches, self-determination, and community empowerment can be achieved from the grassroots up. The social capital developed in times of challenge is a vitally important resource that creates a whole-of-

community spirit. Such community spirit creates solidarity, and partnerships, across cultural divides. At the same time, support from above – governments, the social services sector, the NGO sector, private funders – can and are currently providing essential resourcing for community-led efforts. Such resourcing and expertise should complement, rather than override, place-based and locally-led actions and partnerships. We have a great deal to learn from the Traditional Ecological Knowledge of First Nations peoples.

However, while climate change adaptation is everyone’s responsibility, we reiterate that the only way adaptation action can be successful, is addressing the root causes of climate change.

15. What are the barriers to strengthening First Nations-led adaptation action and partnerships? How could the plan help with these?

If there is a genuine desire to engage with First Nations peoples in adaptation planning, then there needs to be far greater acknowledgement of the ongoing issues facing First Nations peoples across Australia, and the remote Communities and Homelands across Northern and Central Australia in particular. Water insecurity, for example, impacts a high proportion of communities across the Northern Territory; such Communities need their basic needs met, first and foremost, before authentic relationships and collaborations can be built. At the same time, these water end energy-stressed communities are at the forefront of the climate crisis and are most urgently in need of adaptation planning. The communities of Kalkarindji, Daguragu, and Pigeonhole, for example, have been evacuated twice in the past year due to serious flooding, and this places even further social and environmental stress on remote communities. Basic needs, such as homes that are not in a flood zone, are both part of adaptation planning and yet are also a fundamental human right.

The suggestion of a ‘planned retreat’ from Country is an obstacle for many First Nations peoples. It means the permanent severing of connection to Country, culture, mob, lore, and cultural responsibilities to country. First Nations peoples’ identity is intrinsically interwoven with the land; to retreat; it can’t be done without experiencing loss which further amplifies the effects of colonisation and dispossession. It should be noted that this occurs in a context where First Nations peoples are least responsible for climate change and yet most at risk. The concept, for example, of the Top End as a ‘sacrifice zone’ is very much a non-Indigenous way of looking at the earth. As detailed in the [Future Earth 2022](#) report:

Indigenous people have long argued that climate change is inseparable from colonisation. Now, for the first time, the IPCC Sixth Assessment Report (AR6), Working Group II (2022) recognises that colonialism is a historical and ongoing pattern of inequity that intersects with uneven socio-economic development, unsustainable ocean and land use, marginalization, and colonial governance.⁴

Retreat from country is also very much a human solution; we are but one species, with the capacity to retreat, while no other species can simply relocate. First Nations peoples understand the interconnectedness of all life and have a duty of care for all living things. Sacrificing entire ecosystems is an unconscionable thought for those with deep connection to place and a deep sense of belonging, and with a deep spiritual obligation to care for Country – regardless of ethnic background, but

⁴ Future Earth Australia (2022). A National Strategy for Just Adaptation. In collaboration with Australian Academy of Science. P. 22. ([Weblink](#))

particularly true for those cultures that are not dominated by the resource-driven mentality that had led us to the climate crisis.

16. What First Nations-led adaptation actions and partnerships should be prioritised now to support medium-term (2050) and long-term (2100) adaptation?

This is a question for First Nations peoples. Broadly, Jesuit Social Services supports Future Earth's calls for:

- Promotion of Indigenous Peoples' rights to Country, including resources, livelihoods, and lifeways.
- Promotion of Indigenous voices in all levels of government.
- Development of a national Indigenous-led climate change mitigation and adaptation strategy.

As an outcome of these measures, specific adaptation actions and partnerships can be developed by those who have been trusted with the expertise to lead.

17. What First Nations' knowledge frameworks can support measurement and evaluative tools and processes to track adaptation progress?

While this is a question for First Nations peoples, some recommendations from Jesuit Social Services include:

1. Frameworks that require deep listening and embedding First Nations' knowledge
2. Support for Indigenous Caring for Country programs, including for strengthened capabilities of Indigenous rangers to include specific adaptation actions and projects in their work
3. Recognition of the ongoing impact of colonisation, and decolonising efforts
4. Yarning circles, if led by First Nations could be a way of seeking knowledge and evaluation

For more detailed information, including on the need to empower First Nations' leadership and recognising the impacts of colonisation we recommend drawing from the report published by [Future Earth](#).

18. What are the biggest opportunities for First Nations peoples in the context of the National Adaptation Plan?

Climate change adaptation planning, place-based solutions and just recovery for degraded ecosystems must be done through the lens of a just transition, prioritising actions to mitigate the risks for communities most vulnerable to the impacts of biodiversity loss, directly engaging and listening carefully to communities and supporting locally-driven solutions that are both ecologically and economically viable. The National Adaptation Plan should facilitate authentic engagement with First Nations peoples through the lens of social justice, and just transitions.

In its wider sense, a just transition can be understood as the process by which we move from current untenable economic and social systems to an ecologically sustainable, zero greenhouse gas emissions world in a way that ensures those least able to cope with ecological stressors and disasters receive the

help they need to successfully adapt. Just Transition is a vision-led, unifying and place-based set of principles, processes, and practices that build economic and political power to shift from an extractive economy to a regenerative economy. This means approaching production and consumption cycles holistically and waste-free. The transition itself must be just and equitable, redressing past harms and creating new relationships of power for the future through reparations. Hence for First Nations peoples, social justice forms part of the just transition. If the process of transition is not just, the outcome will never be.

This wider vision speaks clearly to the transformational potential of a just transition, and the need to ensure that the transition to a clean energy and low-carbon future does not replicate existing power structures that are harmful or exacerbate existing social and economic inequalities. It also speaks to an opportunity to heal the damage done to ecosystems in the past by investing in restorative practices and policies that can also support emerging sustainable industries.