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8 July 2025

Net Zero Commission
c/o Department of Climate Change, Energy, the Environment and Water
Locked Bag 5202
PARRAMATTA NSW 2124

Dear Sir / Madam

Re: Response to the Net Zero Commission Consultation Paper

The Sydney Coastal Councils Group (SCCG) welcomes the opportunity to provide a response to the Net Zero Commission's consultation paper to help inform the Commission's work and its advice to the NSW Government. We are particularly interested in the Commission's work related to climate adaptation.

1. Background to the SCCG

The SCCG is a regional organisation of councils established in 1989 to promote the sustainable management of Sydney's coasts and estuaries through collaboration, capacity building, advocacy and research. We comprise nine member councils who represent approximately 1.3 million Sydneysiders.

Climate change and how we adapt are some of the most pressing issues of our time. Accordingly, SCCG is committed to act on climate change in line with Goal 1 of its [2019-2029 Strategic Plan](#). This goal seeks to help people and places adapt to future shocks and stressors from a changing climate, including from sea level rise.

Adaptation to coastal hazards is a particularly important aspect of overall climate change adaptation. According to the NSW Government's 2024 [State Disaster Mitigation Plan](#), coastal hazards will account for more than half of the estimated \$9.1 billion in total average annual losses predicted in the built environment from all hazards by 2060. This surpasses the combined damages from other hazards such as storms, floods and bushfires.

2. Development of CMPs and a coastal adaptation planning framework

To adapt to coastal hazards, the SCCG and its member councils are currently developing coastal management programs (CMPs) in accordance with the [NSW Coastal Management Framework](#) to manage coastal hazards. The SCCG, as a regional organisation of councils, is currently project managing the development of the [Outer Sydney Harbour CMP](#) in which coastal inundation with sea level rise has been identified as a priority threat to urban development on the harbour foreshore. It also supports its member councils with the development of CMPs being undertaken by those individual councils.



To support the development of CMPs in the Sydney region, the SCCG has also developed a [position paper on the threat of coastal inundation and sea level rise in Sydney](#). The position paper outlines the increasing threat of coastal inundation in Sydney but notes the varying responses to this threat across all levels of government. The paper highlights a need for greater consistency, leadership and support from the NSW Government for coastal adaptation and ultimately calls for the development of a coastal adaptation planning framework for Sydney.

The SCCG has subsequently pressed for the development of a coastal adaptation planning framework with the [Minister for the Environment](#) and the [NSW Coastal Council](#). We have also suggested, amongst other things, the [NSW Reconstruction Authority provide greater detail on adaptation pathway planning](#) as part of the NSW Disaster Adaptation Plan (DAP) Guidelines.

We have recently submitted an application to the NSW Reconstruction Authority for grant funding under the Commonwealth's Disaster Ready Fund (DRF) Round 3 to co-design a coastal adaptation planning framework for Sydney. We have been fortunate to receive a commitment of financial and in-kind support from 14 local councils, five state agencies, two catchment groups and a Sydney-based NGO. If successful, the SCCG would engage CSIRO, which has significant experience in regional adaptation planning, to co-design the framework with project partners.

3. Responses to Consultation Questions

Given the SCCG's focus outlined above, the SCCG would like to direct its comments towards the questions in the Commission's consultation paper related to adaptation. The table in **Attachment 1** gives our responses to these specific questions. Our responses should also be read in conjunction with any submission from our individual [SCCG member councils](#).

I trust our submission will be helpful in informing the Commission's work. Please do not hesitate to contact me at sarah@sydneycoastalcouncils.com.au should you have any queries.

Yours sincerely



Sarah Joyce
Executive Director

Attachment 1: Responses to Consultation Questions identified in the Net Zero Commission's 2025 Consultation Paper

Consultation Question	SCCG Response
<p>Question 23: The adaptation objective is for NSW to be more resilient to a changing climate. The Act allows for regulations to further define the adaptation objective. What does a more resilient NSW look like to you?</p>	<p>In the coastal context, SCCG considers resilience as a community's ability to prepare for, withstand and recover from major events such as coastal erosion or coastal inundation. The definition implies that these events will continue to occur, and occur more frequently with ongoing sea level rise, but the degree to which they are deemed disastrous will depend on how well local communities have adapted prior to these events.</p> <p>A resilient, well-adapted coastal community is one that has appropriately planned for and is progressively undertaking adaptive action. Good adaptive action will:</p> <ul style="list-style-type: none"> • be based on a dynamic approach that considers impacts across different systems and scales • address scientific uncertainty • consider multiple adaptation options and pathways • utilise actual but pre-determined events as decision points for action • identify appropriate funding and financing mechanisms for adaptation • seek opportunities for creating value and benefit from adaptation • allow for learning by doing. <p>Resilience can be measured through various leading and lagging indicators. For instance, one leading indicator could be the predicted number and value of properties and assets at risk of coastal inundation under varying sea level rise (SLR) scenarios as determined through numerical modelling and risk assessments.</p> <p>One lagging indicator could be the actual damages to property and assets from coastal inundation events as determined through assessment of damage reports, insurance claims, emergency funding, service disruption, etc, following an event.</p>
<p>Question 24: What additional information and evidence should the commission consider when assessing progress towards the adaptation objective?</p>	<p>The SCCG suggests the Commission follows the progress in coastal adaptation planning in NSW being pursued through Coastal Management Programs, forthcoming disaster adaptation plans and, if successfully funded, the Sydney coastal adaptation planning framework project. These adaptation planning approaches will ideally follow a theory of change model that should explicitly detail how adaptation planning and subsequent ongoing adaptive action will lead to good long-term adaptation outcomes.</p> <p>The Commission should consider how adaptation will integrate with and support the functioning of multiple, interlinked systems covering land-use planning, built infrastructure, natural assets, finance and society. Adaptation will also need to be considered across varying temporal, spatial and jurisdictional scales.</p> <p>The SCCG supports the work of the Australian Coastal Society which regularly publishes blogs by Professor Bruce Thom. In Prof Thom's blog of 9 May 2025 on Election 2025: What Can The Australian Government Do For Coastal Management?, he noted the recent release of the Australian Adaptation Database, the Bureau of Meteorology's guide on sea level datasets for coastal hazard assessment and informing adaptation and update of the Federal Government's CoastAdapt resource. Although the translation of adaptation theory, data and guidance to actual adaptation practice in Australia has been slow, the Commission may wish to follow the progress of these initiatives in improving adaptation practice.</p>

In scoping its recent DRF Round 3 application for the Sydney coastal adaptation planning framework, SCCG, together with staff from CSIRO's [Enabling Adaptation Pathways](#) and [Enabling Resilience Investment](#) teams, noted a lack of institutional capability and capacity to adapt, challenges in financing and funding coastal adaptation, and a lack of detailed guidance of coastal adaptation. Institutional capacity, funding and guidance are all key enablers for adaptation that should be considered as part of tracking progress towards adaptation objectives.

Coastal adaptation lies at the intersection of disaster management, disaster risk reduction and broader climate change adaptation. It is suggested the Commission follow the work of the NSW Reconstruction Authority and the National Emergency Management Agency to consider how adaptation objectives can align with and help support the objectives of disaster risk reduction, particularly through the preparation of DAPs.

Question 25: How can adaptation planning better use the NSW Government's climate change projections (NARClIM)?

The SCCG will rely on sea level rise and coastal inundation data referenced by the NARClIM project, for example, in the [NARClIM2.0 Metropolitan Sydney regional climate change snapshot](#), as well by [AdaptNSW](#), for use in preparing the Outer Sydney Harbour CMP and, if funded, the Sydney coastal adaptation planning framework.

Question 26: What other information or tools are needed to support decision-makers in NSW?

A key data set will be the state-wide coastal inundation mapping and property exposure assessment that is currently being undertaken by the Department of Climate Change, Energy, the Environment and Water (DCCEEW) as part of an update to its 2018 assessment. This work has been ongoing for several years and its timely release is highly anticipated by SCCG, its member councils and others undertaking coastal adaptation.

It is important to note, however, that these data, while necessary for establishing a scientific foundation for understanding coastal inundation, are not sufficient by themselves to plan for adaptation. Adaptation planning is primarily a socio-institutional exercise that draws from broader fields of adaptation theory, decision making, risk management, governance and finance.

The SCCG has initiated the Sydney coastal adaptation planning framework as a means of better interpreting these data but also in recognition of the fact that existing guidance and tools such as the [XDI: The Cross Dependency Initiative, guidance for considering triggers and thresholds in CMPs](#) and [draft guidelines for the staged development of DAPs](#), do not provide sufficient detail for coastal councils and state agencies on how to undertake adaptation planning in a way that is collaborative, regionally consistent and integrated with existing institutional processes.

We would welcome the Commission's support for our proposed Sydney coastal adaptation planning framework and any efforts by the Commission to advocate on our behalf with the NSW Government.