

SYDNEY COASTAL COUNCILS GROUP Inc.
PO Box 999, Manly NSW 1655
Email: info@sydneycoastalcouncils.com.au
Web: www.sydneycoastalcouncils.com.au
ABN: 39 638 876 538



Reference: 027-26 SJ

Monday, 6 July 2026

Dear Sir / Madam

Re: Draft Policy Position Paper: National Environmental Standard for Data and Information

Introduction

The Sydney Coastal Councils Group (SCCG) welcomes the opportunity to comment on the [Draft Policy Position Paper for the National Environmental Standard for Data and Information](#) (the D&I Standard). We request that this submission be read alongside the individual submissions provided by our [member councils](#).

SCCG is a Regional Organisation of Councils representing coastal and estuarine councils across Greater Sydney. For more than 35 years, SCCG has supported evidence-based coastal management, climate adaptation, and regional collaboration. Our member councils are at the frontline of responding to sea-level rise, coastal hazards, and climate-driven environmental change, and rely heavily on high-quality environmental data to make defensible, long-term decisions.

We strongly support the intent of the D&I Standard and its focus on improving the quality, transparency, comparability, and reusability of environmental data. We consider the Standard a critical reform that will materially improve environmental decision-making under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

However, we identify a significant national gap that must be addressed for the Standard to be effective: the absence of nationally consistent, authoritative and trusted sea-level rise datasets and guidance. To ensure the Standard delivers on its objectives, we recommend a series of targeted improvements to strengthen its treatment of coastal and climate-related data.

Issues and Recommendations

SCCG strongly recommends that the D&I Standard explicitly address sea level rise not being explicitly addressed in the Standard.

Sea-level rise is one of the most consequential long-term environmental trends affecting Australia's coasts, yet national datasets remain inconsistent across jurisdictions, updated irregularly, difficult for proponents to interpret, and not aligned with the latest climate science. They are also not mandated for use in EPBC assessments.

Yet Councils and their communities rely on EPBC Act decisions to be future-proof. Infrastructure, land-use planning, and coastal adaptation decisions have long lifespans. EPBC approvals that do not incorporate consistent sea-level rise data risk maladaptation, stranded assets, increased exposure to coastal hazards and higher long-term public costs.

The draft Standard acknowledges that “*Environmental decision-making often encounters challenges from incomplete and inadequate data*” and that “*Consistent data and information collection and management enable direct comparisons over time*”. To ensure that the Standard achieves the principles of representative, transparent and comparable data, SCCG recommends:

Recommendation 1: Nationally consistent sea-level rise projections aligned with IPCC AR6 and updated at least every five years.

Recommendation 2: Inclusion of certified sea-level rise datasets in the Register of Trusted Environmental Data and Information Assets

Recommendation 3: Clarify in the Standard that sea-level rise must be considered in all EPBC Act assessments in the coastal zone including project level assessments, Ramsar assessments, strategic assessments, bioregional plans, and offset proposals.

I trust our submission will be helpful. Please don't hesitate to contact me by email at sarah@sydneycoastalcouncils.com.au if you have any queries.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Joyce', with a stylized flourish at the end.

Sarah Penny Joyce
Executive Director