

3 November 2011

Standards Australia
GPO Box 476
SYDNEY NSW 2001

By e-mail to: mail@standards.org.au

Dear Sir/Madam,

**RE: Submission to Draft for Public Comment Australian Standard –
Climate Change Adaptation for Settlements and Infrastructure (DR AS 5334)**

This submission is made by the Green Building Council of Australia (GBCA) in response to the release of Standards Australia's *Draft for Comment – Climate Change Adaptation for Settlements and Infrastructure (DR AS 5334)* ('the Draft').

Our submission acknowledges that the purpose of the consultation is to seek feedback on the technical content, wording and general arrangement of the document, as well as to seek acknowledgement if the Draft is acceptable without change.

About the Green Building Council of Australia

The GBCA is Australia's leading authority on green buildings and communities, established in 2002 to develop a sustainable property industry in Australia and drive the adoption of green building practices. The GBCA promotes green building programs, technologies; design practices and processes, and operates Australia's only national voluntary comprehensive environmental rating system for buildings - Green Star.

The GBCA has more than 900 member organisations, including government departments, which work together to support the Council and its activities. The GBCA is also a founding member of the World Green Building Council, which was established to provide a federated 'union' of national green building councils with a common goal to support the sustainable transformation of the global property industry; there are now 89 such councils worldwide.

The Green Star rating tools

Green Star is a voluntary tool that encourages, recognises and rewards best practice and innovation. The first Green Star rating tool was released in 2003 in response to market demand for a rating tool that would evaluate the environmental design and construction of buildings as well as establishing a common language for green buildings.

There are currently nine Green Star rating tools which address a range of building types and more than 360 projects have achieved Green Star ratings, with a further 540 developments registered. The Green Star rating system is designed to take an holistic approach within each class and building sector, addressing nine categories in total: Management, Indoor Environment Quality (IEQ), Energy, Transport, Water, Materials, Land Use and Ecology, Emissions and Innovation.

The GBCA engages with all levels of government and advocates its 'green building agenda', which outlines the five priorities that it believes will place Australia on a clear, long-term pathway to sustainability.

These five green building priorities are to:

- Provide visionary government leadership
- Retrofit and improve existing buildings
- Green education and healthcare facilities
- Move beyond buildings to communities and cities
- Embed green skills across all industry training

The GBCA believes these priorities, if addressed effectively, will help transition Australia's green building practices 'from voluntary to vital'.

Green Star – Communities

In addition, in 2009 the GBCA commenced work on the development of a rating tool for sustainable development projects on a community scale. The first step in developing the Green Star - Communities rating tool was to develop a national framework consisting of five best practice principles (a copy of the Green Star - Communities Framework is enclosed).

Stage 2 of the project involves establishing best practice benchmarks for assessing and certifying sustainable communities. A set of draft credits has been developed and these are currently being tested on a number of projects across Australia (copy enclosed).

Extensive consultation has been undertaken with all levels of government and a wide range of industry stakeholders in the development of the Green Star - Communities tool.

Background

The GBCA, along with other key built environment industry players, has advocated for many years that the built environment is critical to the future of Australia's productive capacity, the wellbeing of communities and the health of natural ecosystems.

This has culminated in a shift in national policy that provides increasing recognition of the built environment's role and the need to respond to a range of significant challenges, such as population growth and demographic change, transport congestion, global competition, climate change, resource depletion, housing affordability, infrastructure deficit, access to services, biodiversity conservation, and energy and water efficiency.

In our view, a key to progress will be the successful adaptation of our built environment to these and other challenges, most of which have inter-dependencies and all of which have outcomes that can impact upon social, economic, environmental and governance progress.

The GBCA supports the view that new settlements and infrastructure should be designed to avoid or mitigate the risks from climate change from the start. The Green Star - Communities tool contains draft credits covering aspects of climate change including climate adaptation and resilience.

Submission

The Standard in question focuses on organisations that need to consider the risks of climate change in the lifecycle of settlements and infrastructure and is relevant to all organisations that plan, approve, permit, commission, design, construct, install, operate, insure, maintain and decommission settlements and infrastructure. This early and holistic view on influencing climate adaptation opportunities aligns with the Green Star – Communities rating tool.

It remains important to avoid prescription, and advocate an approach based on risk management. The Standard follows the International Standard ISO 31000:2009 *Risk management Principles and guidelines* (AS/NZS ISO 31000:2009) which is internationally recognised and provides well-regarded guidance on how to integrate risk and responses into existing management and decision making processes within an organisation.

The focus of the Standard's general and widely applicable framework and process is on ensuring that climate change adaptation is considered as part of an organisation's existing management and decision-making processes, recommending a systematised approach to evaluation of options for climate change adaptation.

Whilst the Standard sits within a plethora of existing planning documents and guidelines written for organisations to undertake adaptation planning and evaluation, its focus as a risk-related climate adaptation plan enables it to play an important role in supporting the integration of all risk processes within organisational decision making.

The Standard identifies key triggers for its use, including the process of planning for a new settlement or piece of infrastructure and / or in the preparation of an adaptation plan, prior to approval of a specific objective.

It states that more detailed accompanying guides are planned in the future that may also be useful for organisations. It does not give any recommendations on the specific nature of science to be used in assessment of risks but that whatever is used should be authoritative and credible. The GBCA would welcome the opportunity to provide input into the development of future guides, particularly if relevant to buildings and urban development.

The Draft Standard for Climate Change Adaptation for Settlements and Infrastructure follows the International Standard ISO 31000:2009, *Risk Management – Principles and Guidelines*. The GBCA is supportive of its member organisations that are seeking to integrate robust and well-regarded risk management-oriented approaches such as this to address climate change adaptation into their existing management and decision-making processes.

The Draft Standard considers its use with various triggers, including in the preparation of an adaptation plan. There is a strong link here with the requirements being built into the Green Star - Communities Tool. The tool includes credits which, in combination, lead planners and developers through a process intended to provide clear guidance on how to plan, design and deliver communities that embed best practice climate change adaptation and resilience.

Specifically the Climate Adaptation and Resilience draft credit within the Communities Tool, which has the objective *'to encourage and recognise projects that can adapt and are resilient to the impacts of a changing climate and natural disasters'*, requires planners and developers to develop a Climate Adaptation Plan in line with best practice risk and adaptation standards. The standards referenced in the credit include ISO 31000:2009 and DR AS 5334 recognising their international use and credibility.

The Climate Adaptation and Resilience draft credit requires the Climate Adaptation Plan to source climate data from specific sources considered 'best available', robust and credible (which includes the IPCC, CSIRO and State Governments). The credit also acknowledges the need to take into consideration any evolving science. The proposal outlined in the Forward to the Draft Standard states that, as the Standard becomes more frequently used, a range of guides will be developed to assist users in the areas of different infrastructure sectors and or for specific climate attributes. The GBCA would support this action.

Also supported are the Principles outlined in the Standard; in particular, the consideration of climate change risks at all stages of the lifecycle of infrastructure and settlements. The development of new settlements, in particular, can occur over many years with a need to consider changes to planning requirements and evolving science in that time.

In addition, the principle of involvement of stakeholders in settlements and infrastructure is seen as critical to its successful delivery. The Green Star - Communities tool includes credits that encourage and recognise projects that develop and implement a comprehensive stakeholder engagement strategy specific to the project, that enhance the community's knowledge and understanding of sustainability, and that promote community development. We would also concur that early, broad and meaningful stakeholder engagement is vital to successful planning and implementation of sustainable settlements.

Conclusion

It is becoming increasingly important for organisations working in the built environment to take an holistic and integrated approach to climate change. The Draft Standard continues a focus driven by Standards Australia to encourage critical issues such as climate change to be considered within existing risk processes in organisational frameworks. A systematised approach to risk assessment for climate change is supported by the GBCA and identified as one of the best practice benchmarks in the Green Star - Communities tool that seeks to create industry demand for a risk-based climate adaptation approach to urban development planning and design.

We would welcome the opportunity to discuss, clarify and elaborate on this submission with The Standards Australia Committee responsible for Climate Change Adaptation.

Yours sincerely,



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