

Submission to the National Adaptation Plan (NAP) Issues Paper

15 April 2024

For further information or questions about this submission please contact:

Katie Maskiell

Head of Policy and Advocacy

UNICEF Australia

e: kmaskiell@unicef.org.au

m: +61 417 091 806

UNICEF Australia welcomes the opportunity to provide comment on the Australian Government's *National Adaptation Plan (NAP) – Issues Paper, March 2024* (the issues paper). UNICEF is the United Nations Children's Fund and works across more than 190 countries and territories, to help children survive, thrive, and fulfill their potential. This short submission outlines initial reflections on core aspects of the issues paper, without making significant comment about the specifics of adaptation action in each of the nationally significant risk areas identified for prioritization. Detailed comment on these will be made in UNICEF Australia's submission to the draft NAP itself. As will be apparent, this submission responds to consultation questions which relate to issues that UNICEF has some experience or expertise with.

- **What do you think a well-adapted and resilient Australia looks like? Does the draft vision capture this? Why, why not? Do you agree with the key objectives of the plan? What other suggestions do you have?**

Children are [highly exposed](#) to the effects of climate change. A child [born in Australia](#) in 2023 will experience four times as many heatwaves, three times as many droughts, and 1.5 times as many bushfires and river floods than a child born in Australia in 1960.

Children are also [uniquely vulnerable](#) to the impacts of climate change. This stems from the fact that they are at a much earlier stage of physiological and cognitive development, and therefore less equipped to deal with climate-related shocks and stresses. Globally, more than 88% of diseases attributable to climate change occur in children younger than five years of age. A 2021 UNICEF survey found that [84% of young Australians](#) included were extremely, very, or moderately worried about climate change, with almost half of those surveyed feeling distressed to the extent that it was affecting their daily functioning.

Climate change also disrupts social services and sectors – early childhood education and care (ECEC); primary and secondary education; child and maternal health; agriculture, food and nutrition; social protection, including child protection; housing – which children rely on to survive and thrive. However, not all children are impacted equally, with those living in rural and remote communities, those from low socio-economic backgrounds, and from First Nations backgrounds, particularly vulnerable to more severe, complex, and compounding impacts.

The impacts of climate change on children and young people costs the Australian economy billions of dollars. A [recent study](#) by Deloitte Access Economics (DAE) and UNICEF Australia found that the economic impact of disasters on children and young people's mental health, educational attainment, and homelessness status is estimated to be \$3.1 billion in an average year and \$6.2 billion in a high disaster year. This is almost certainly an underrepresentation of the cost of impacts, given the lack of data on other variables such as nutrition, violence, and physical health impacts.

From UNICEF's perspective, a well-adapted and resilient Australia is one that ensures that children and young people, who make up approximately one-third of the national population, are protected, prepared, and prioritized in response to climate change, both today and into the future. Child-sensitivity in Australia's National Adaptation Plan (NAP) is not only a matter of intergenerational equity, but also good for the economy, and for national and community resilience in the long-run.

It should be noted that the issues paper makes no mention of children, young people, or youth. If we are to assume that reference to the 'economy', 'society', 'natural and built environments' systematically includes the specific needs, perspectives, and priorities of children and young people and the sectors they rely upon, then the vision broadly captures our description of a well-adapted and resilient Australia.

In terms of key objectives, a well-adapted and resilient Australia requires a substantial uplift in private sector investment, *and* a continued increase in public sector investment at all levels of government. It also requires not just the 'establishment of support,' but a significant recalibration of the scale and nature of support for people and communities in disproportionately vulnerable situations, given the emissions trajectories, climate risk modelling, and climate impact assessments.

- **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 National Adaptation Plan and why?**

Each of the nationally significant risks identified in the National Climate Risk Assessment (NCRA) has important potential impacts on children and young people, both today and into the future. There are direct risks to children's and young people's health and wellbeing from slow onset and extreme climate impacts that require urgent attention in policies, investments, and future planning. UNICEF Australia advocated for the inclusion of children, and young people as a priority population in the National Health and Climate Strategy (NHCS), and we welcome this inclusion. The proposed National Health Adaptation Plan (NHAP) should prioritize strategies and actions that strengthen the resilience of children and young people to the health and wellbeing impacts of climate change.

The focus on 'social support' should also be a priority, encompassing appropriate and scaled reforms to risks posed for children and young people by food and water insecurity, entrenched poverty, threats to current and future livelihoods, and malnutrition, all of which exist to varying degrees in specific demographics and geographies within Australia.

UN agencies utilize a range of 'theme-agnostic' tools for prioritization within national adaptation planning processes. Assessing risk is fundamental to the exercise of prioritization and aligns well with the approach the Government has taken. The [Children's Climate Risk Index – Disaster Risk Model \(CCRI-DRM\)](#), which is a subnational risk assessment model focused on the understanding and management of risks that children, young people, families, and their communities face from climate, environmental, and other natural hazards, is an important precursor to child-sensitive adaptation planning.

Other prioritization tools include the trifecta of approaches outlined in UNDP's [LEG NAP Technical Guidelines](#),¹ namely cost-benefit analysis (CBA), cost effectiveness analysis (CEA), and multicriteria analysis (MCA).

Finally, children and young people should have a voice and a platform to share their perspectives on which nationally significant risks are most applicable and relevant to their current and future needs. Not only is a participatory approach to the policymaking enshrined in Article 12 of the [Convention on the Rights of the Child \(CRC\)](#), it can also enable a holistic picture of risks and priorities to enable more effective adaptation planning. There are many tools that Governments can use to garner the insights of children and young people at-scale and in a timely fashion, including UNICEF's own child and youth engagement platform [U-Report](#).

- **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?**

The importance of ensuring that the voices and perspectives of children and young people are heard – both directly and indirectly - in adaptation policy governance at the national level cannot be understated. Children and young people are at the forefront of climate action in their local communities, and often engaged in adaptation action. Children and young people are also advocating for adaptation policy reforms at State and Territory, Federal, and multilateral levels through a range of forums. We note that there are several stages of the National Adaptation Plan's (NAP) development, and each includes avenues for participation from the wider community.

There are a range of approaches, mechanisms, and tools through which governments can platform the voices and perspectives of children and young people in process such as the NAP's development. UNICEF's ['Engaged and Heard!'](#) guidelines provide detailed information on how to enable such engagement with adolescents, and also has significant expertise in engaging younger children in such processes, as noted below.

At a systems level, the voices and perspectives of children and young people should be embedded in the Government's policymaking architecture. UNICEF Australia welcomes the Office for Youth's new national youth engagement strategy,

¹ The Least Developed Countries Expert Group (LEG) makes recommendations in relation to LDCs, however the tools mentioned may be useful in part.

which commits to recognize and listen to young people; empower young people to advocate and engage with government; and support government to work with young people.² We see the resourcing of the Office for Youth and the development of this strategy as a critical first step in consistent, effective, whole-of-government engagement with children and young people on complex policy agendas such as the NAP going forward. There is still time for this NAP to include dedicated consultations with children and young people, alongside child and youth-focused organisations such as UNICEF Australia, and we would welcome the opportunity to discuss the practicalities of such an engagement.

The issues paper outlines four key roles and responsibilities for the Federal Government in relation to adaptation policy and planning. Carrying out these diverse and complex roles and responsibilities in an ongoing and effective manner potentially requires a significant investment in resources, and a coordinating authority to bring together many institutions and leaders operating at local, state and territory, and national levels. There should be consultation of the pros and cons of different models of coordination such as the potential creation of an equivalent of a National Net Zero Authority to address adaptation challenges of similar significance, for example.

- **How should adaptation success be measured?**

In a strictly technical sense, adaptation success for children and young people should be measured against any number of indicators and metrics which align to a series of core principles, outlined in UNICEF's [submission](#) to the UAE-Belem work programme on indicators for measuring progress achieved towards the targets of the Global Goal on Adaptation Framework:

- Indicators cover targets in child-critical social service areas, including water, food, nutrition, mental and physical health, infrastructure, and essential service delivery related to poverty, livelihoods, and income support; these indicators should be built upon pre-existing normative definitions and standards relating to climate adaptation and resilience in each sector.
- The development of indicators and methods for monitoring progress should be done in consultation with statistical offices and global data custodians, with a view to reviewing, cataloguing and evaluating the suitability of existing and emerging data sources across sectors.
- Indicators and metrics should be age, disability, and gender-responsive, and consider the entire life course of children; Indicators should also be disaggregated by demographic where possible.

UNICEF's submission provides links to indicators and metric-sets in many of the social service areas outlined above.

Moreover, an important factor in cultivating improved 'child-sensitivity' in adaptation planning, is the ability to test different elements of the policy development process against indicators and metrics which explicitly measure child sensitivity in different ways.

For example, the Australian Human Rights Commission (AHRC), with UNICEF Australia's support, has recently developed A Child Rights Impact Assessment (CRIA) [tool](#), which will help governments and service providers assess how children's rights and wellbeing will be affected by new laws and policies. The tool is an 18-question checklist which can be used to measure the impact of any new laws or policies on the wellbeing of Australian children and families and determine whether the proposed laws and policies support their best interests. The CRIA could feasibly be modified and employed for each individual significant law or policy, and its findings disclosed on the public record.

Another credible measure of child sensitivity in adaptation planning is to measure law, policy, investments, or activities against child-centred indicators for successful adaptation action. UNICEF Australia and the Young and Resilient Research Centre (Y&R) at Western Sydney University have partnered to develop child-centred indicators for climate change and climate action. Child-centred indicators describe the kinds of changes, improvements or developments that mark progress towards achieving climate outcomes, from children's and young people's perspectives. Working with youth researchers and UNICEF personnel, the Y&R team distilled children's and young people's insights into a set of 47 indicators that measure against the below outcomes and ideal states identified by the study's participants as critical to driving climate change that impacts their lives positively.

² [Engage! - Office for Youth, Australian Government](#)

Measuring the success of mainstreamed adaptation action requires mainstream adaptation action-related metrics and indicators in broader national frameworks, such as the Measuring What Matters Framework, and the National Agreement on Closing the Gap.

- **Do you support the draft principles for prioritizing and sequencing adaptation actions over time? Why or why not? Are there any gaps?**

UNICEF Australia supports the principles for prioritizing and sequencing adaptation actions over time, including the emphasis on co-benefits, future-oriented thinking, long-term pathways, multisectoral, and equity considerations. As noted in UNICEF's [submission](#) to the UAE-Belem work programme, intergenerational equity underlines the obligation of Parties to ensure children's rights to a clean, healthy, and sustainable environment, highlighting that current decisions on investment in adaptation and resilience will significantly affect both present and future access to such an environment.

Under this principle, the indicator framework should include metrics that take on long-term planning and can be effective up to and after 2030. It should furthermore prioritize human capital development through resilience investments and building skills of children and young people to address challenges associated with our current climate reality. Finally, intergenerational equity cannot be met without environmental sustainability. Adaptation effectiveness decreases with rising temperatures, particularly in the fields of energy, flood risk and urban water, meaning that solutions built today will no longer serve future generations in the absence of ambitious action to curb global warming.