

Parents for Aotearoa Submission on the National Adaptation Plan



June 2022

[Parents for Climate Aotearoa](#) is a group of largely parents and wider whānau, concerned with our families and particularly the future of our tamariki and mokopuna in a rapidly warming world. Our parents come from a range of backgrounds and experiences including climate science, social science and policy. We are also ordinary parents standing up for climate justice, in between our family and community commitments, to ensure all children have a safe climate and world to live in.

We are very concerned for those already vulnerable, marginalised and whose voices are ignored in our society. They are most at risk of the consequences of climate change and by poorly thought out mitigation measures. **Our society's role, led by the government is to ensure that no one is left behind.** Our lack of urgency and action today will be felt by our children tomorrow - many people, particularly women and children are hurting today around the world, from the consequences of global warming.

We welcome the first draft adaptation plan as a long overdue first step in a national framework for climate change adaptation. We are in the midst of making and implementing major decisions on how we respond and adapt to a warming climate, including limiting that warming to below 1.5 degrees. A major barrier to real democratic engagement however is lack of plain language and accessibility. These plans will have a long lasting impact on people's lives, particularly our tamariki and we continue to feel frustrated by the gatekeeping language and inaccessibility for everyday people. There have been a multitude of lost opportunities to properly engage with New Zealanders on climate change and solutions. As we have mentioned in many submissions before, people came together in 2020 to protect the people we love and our communities from Covid-19 because of the clear direct communication from our elected leaders. We knew the problem, the scale and we acted accordingly. **In a nutshell this submission calls for serious investment and resourcing into engaging, educating and empowering people and communities to act now on climate change.**

We have decided, in the spirit of accessibility, to summarise our recommendations as below, as these recommendations are relevant to most of the questions. You will also note the repetitive theme in each section outlining the need for resourcing engagement, in a way that actually works through trusted community messengers.

Our Concerns and Recommendations

Accessibility of Adaptation information and Consultation Process

As stated above, we continue to be very frustrated at the form and process these consultations take. Even with a university degree or policy analysis experience, it is a big ask for individuals and families to navigate these long consultation documents with more than 70 detailed questions to answer.

Our families need good, accessible, plain language information. Our members want to contribute, though at present there are many barriers. Ideally, in submitting on this plan, people would have an understanding of the risks and changes that we need to adapt to. While there is some information around, much is incomplete, or again in a form that is inaccessible to most. The National Climate Change Risk Assessment for New Zealand (NCCRA) is central to this consultation, yet it is a document that is not in an accessible format or language. **More work needs to be done to translate these complex technical documents into forms accessible to the public.**

Public participation is crucial especially when making these big decisions.. Communities need to be able to talk face to face with officials and scientists, to have complex scientific concepts made understandable. They need to hear how climate change will impact their lives in a local and social context and what practical options are available to adapt. **People need to be able to participate in honest conversations about what measures are feasible and affordable and be supported to come up with their own solutions as a local community.** This is a fundamental part of good adaptation outcomes for our local villages, townships, urban and rural areas..

We have noticed and welcomed how some councils have taken steps to make their consultations more accessible. **These include providing short summary (or snapshot style) documents, alongside the more information dense documents.** Some have made improvements to their submission options, with a limited number of questions and multiple ways of giving feedback. While these are not perfect they are a step in the right direction, with the councils limited resources.

Our recommendations for improving the consultation process:

- A simplified format explaining in plain language explaining the challenges ahead of us, that is made available in a number of formats (summaries, long technical documents, video, audio etc).
- Provide ongoing, ring-fenced funds for consultation at both the central and local government level.
- The opportunity to listen to and ask questions of officials, including one-on-one (which works better for those who don't feel comfortable addressing a crowd).

- For large important consultations like this one, provide a short and long set of questions.
- A participatory process for areas we know are already being hit by the impacts of climate change (e.g. Westport, Tairāwhiti). It would be useful to find out from those recovering from climate induced events, what would have helped. We can then set up better systems and resources for all communities.

Urgency and Capacity Of Central and Local Government

The National Adaptation Plan outlines a truly enormous work programme over the coming years. The public service is already under heavy pressure from the ongoing Covid-19 response and in no position to pick up additional responsibilities especially now we have record low unemployment. Given the ongoing public sector salary freeze and soaring living costs, people are leaving for overseas opportunities. **We are concerned on how the government will be able to prioritise climate mitigation and adaptation.** We hope the Climate Change Ministers Group is working on this.

Local Governments have been carrying the burden of climate adaptation. Councils and their communities do need better legislation and they also need increased capacity to do that work. **Councils and communities are the ones who deal with the interconnectedness of the risks, impacts and solutions, so it is vital that there is a coordinated co-created response and plan.** There is not enough in this plan to help councils respond and adapt to increasing risks from a changing climate.

In this plan, there are a lot of new methodologies and plans expected to be developed over the next five years. A budget to implement these and upskill those working on them is required. **This is a significant amount of change and it needs to be resourced properly, including communicating these plans and related information.**

While strategies can be useful, the Government has committed to more of this rather than concrete action. **Policies are needed now over strategy development at this late hour, and ones that will deliver rapid changes rather than small tweaks.** Politicians and public servants are called upon to draw on their courage, inventiveness and speed in an unprecedented way.

This plan will take time to finalise and be implemented. **In the meantime government departments and agencies and councils are making infrastructure and project decisions that could result in reducing future adaptation options and stranded assets.** Examples include new libraries beside coastal rivers, airport expansions and new roads. Our members see this in their communities and it is difficult (though we still try) to have discussions with councils about these projects

and unintended consequences. It is vital we stop the bad stuff as soon as possible. **New infrastructure and anchor projects built now in vulnerable areas, will most likely result in needing expensive protections into the future. It reduces the options to what are the best adaptation solutions for those areas and potentially puts a heavy cost burden on future generations.** Yes, while we do need legislation and a framework to facilitate decision making, we also have enough information now to put a directive out that decisions must take a precautionary approach. **We cannot continue to rely on historic and current decision making processes, as risks are changing.**

Our recommendations:

- That the government sends a clear statement to all government departments and agencies, councils and businesses that they must not wait for legislation and the adaptation plan. They must take adaptation and mitigation into account when making significant decisions that could have long term consequences on adaptation and reducing emissions.
- That councils are fully resourced to do this work, that includes significant funds for their community engagement (discussed further in our submission).
- Government staff are fully resourced and supported to do this work and prioritised.
- Partner with organisations and community groups to help develop the plans at both a national and local level. Our local communities, catchment groups and iwi are already getting on with many actions that have multiple co-benefits (e.g. adaptation, mitigation, sequestration, improving water health, biodiversity and economic sustainability), that draw on their intergenerational knowledge and experiences.

People and ecosystem centric approach

People and ecosystem centric approach to climate adaptation, one addresses both inequity and intergenerational fairness is a must. **Our communities are at the heart of our society and without thriving, healthy people we do not have an economy. Our people are connected to everything, including how we look after our ecosystems.** We feel our communities and people are continually under valued in this plan. This is expressed in subtle ways like the relative length of the sections, where the Community section is significantly shorter than the Economy and Financial System section.

The Economy and Financial System is fundamentally broken. It only works for the very small percent of people, ironically the very percentage that has contributed the most to climate change. These systems were created by people and are not their own living breathing entities that need to be continually revived. We have an opportunity right now to replace these antiquated systems to one that vastly improves the lives of our people and restore our ecosystems.

We need a plan that centres improvements to health and wellbeing, not just making things less worse. There are many opportunities to do this throughout government and society. When we reduce inequality, we can improve both access and affordability of our houses, which also improves our health. This approach is particularly lacking in the Homes, Buildings and Plans section.

We have long known that climate change is and will continue to exacerbate existing inequalities and it was identified as one of the most significant risks in the NCCRA. **We must put our people at the heart of this, actively addressing the different needs of our diverse communities is vital in the supporting action for communities of “Building community resilience through social cohesion”.** This also needs to be proactive and not just reactionary.

As discussed earlier, a people centric approach also includes reducing barriers to participate at all levels of governance and decision making. We need to provide a number of ways to participate that fits the needs of communities and different stages of life. For example families with young kids have different needs of youth and different needs of retired people. **We need all parts of our society to actively contribute, especially the most affected voices.**

Our Recommendations

- Put the wellbeing of people and ecosystems first.
- Focus on the opportunities of co-benefits of adaptation and mitigation, such as:
 - Good quality, accessible and stable housing, that results in healthy people, stable communities, less emissions and enabling people to participate in their communities, such as adaptation.
 - Programmes to strengthen social cohesion that improves community relationships, trust in institutions such as councils, recover faster from disasters and fosters and encourages people to participate in their community.
- Support and enable community projects and solutions that are co-created and supported by their councils. People in our communities have a wealth of intergenerational knowledge about their areas, particularly Māori and could do a lot more if they were resourced more.

Information and Community Discussions

We do not think the government has the social licence for mitigation or this adaptation plan. **There is a disconnect in current concern about climate change, what is needed for adapting and mitigating climate change, and the general public understanding of these challenges.** We see this everyday with our families, friends and communities. It is important that we connect the dots between what is happening to our climate and why and what are our options and solutions. At

present our communities have incomplete information, often mainly just the problems and consequences of climate change. **Which results in people feeling disempowered and worried. Even worse, disengaged.**

At the same time, central government has been concentrating on foundational legislation and reforms, without in-depth community conversations as to why, which has left many people thinking the government has the climate change response under control, and life will continue as normal with a bit more recycling, EV's and bus routes. As stated in the plan "This is a Government-led plan for all New Zealanders" (p.13) and that means we all have an important part in adapting to climate change. **We are however, currently stuck with this incomplete shared understanding and to move forward collectively we need a more complete shared understanding.** This must be done in a way that doesn't disempower people with an overload of doom, but frames a positive low emissions future which supports people better than the current capitalist model.

While the plan acknowledges this in places like "Communities and individuals need to be involved in decisions on adaptation where they will directly feel the effects. Knowledge and data on climate impacts and risk will help them to make informed choices about responding to climate change, so they can prepare for the impacts and manage risks" (p.18). It is not a focus anywhere in prominence. And it goes beyond the critical action of raising "awareness of climate-related hazards and how to prepare". **This needs to be well resourced and in multiple ways that suits the needs of our diverse communities.**

As we discussed earlier in our section on consultations, there is a major need that is not being met. As discussed in the plan we have a lot of information, though "it can be hard to find and use" (p.30). We wholeheartedly agree. **As a climate advocacy organisation, we are aware of this wealth of information, though rarely do we come across any that is in a form that most of our members and communities can access and understand.** It is just too hard and overwhelming for many we speak too.

We note that the NCCRA made numerous mentions of the importance of accessible information and participation. The irony is this sentence in itself is inaccessible for many to understand in context. For example "Limited knowledge or understanding of climate change risks (potentially a consequence of limited access to information) can result in maladaptation and path dependency as well as constrained adaptive capacity, further exacerbating inequality" and "Inclusive decision-making and adaptation strategies that help to increase self-efficacy and empower individuals to participate may help address existing inequalities and limit future ones.." (NCCRA p.65).

Lack of resources was also identified as a risk, where funding is limited or absent include “Participation and engagement: Extended engagement is necessary to create a shared understanding of climate change risks, and to avoid breaching the Treaty of Waitangi obligations (NCCRA G4, p.95). Engagement is currently constrained by lack of resourcing...”. **Furthermore, risks were identified to our democracy, which we think are increasing, as there is a lack of shared understanding for both adaptation and mitigation, which are likely to erode social cohesion and trust in our institutions.**

Community engagement is central to adaptive pathway planning. Engagement and accessible information is important if the outcome of "Decision making is transparent and builds and maintains trust" for communities to adapt. The case study of the head of Lake Wakatipu (p.76) outlines the importance of communities in decision making.

We note that “open access to data, models and scientific information, to suit different audiences.....to the general public” (p.103) has been identified as a gap in hazard research. And this has been identified as an issue for Maori “there is a need to translate scientific knowledge into meaningful information that the community can use” (p.104). Again, accessibility is an issue too. We are concerned that there is not enough detail and focus on the research priority of “provide open access to data, accessible to a variety of audiences” (p.105). A core aspect of accessibility is translating the data and information into a variety of formats and language that is suited to our diverse communities. **Putting it on a website is not enough, many of our families and people do not have good access to the internet or know how to use it.**

Again, as repeated several times above, central government has an important role in this and it needs to support local governments.

Too much of the information is targeted to the central and local governments. Our communities need more than one online large information portal which runs the risk of being clunky and overwhelming to many. We need ongoing information and resources, from a variety of trusted messengers to lead and enable conversations at the community and family level. **Then people and their communities can effectively engage in deciding with local and central governments how we adapt, where and how that changes through time.**

Our recommendations:

- Properly resource information and resources at all levels. That includes substantial ring-fenced funds from the Climate Emergency Response Fund (CERF), that funds three areas:
 - Government information
 - Council education and engagement

- Community organisations and trusted sources for our diverse communities
- There needs to be an additional principle in the plan (p.16), of providing and supporting information in a variety of accessible forms that meets the needs of our diverse communities.
- There should be a focus in the Systems-Wide Actions that covers the accessible information to the public that meets their diverse needs.
- This is coordinated and integrated with mitigation information and resources as they are interrelated.
- The funds must resource a range of information forms (online, text, videos, podcasts, interactive) and in many languages that are co-created by communities.
- A significant proportion of the funds should go to people to have these conversations within their communities and all demographics in a way that suits their needs.

Holistic approach and the Interconnectedness of Causes, Risks and Solutions

While we acknowledge that this is a complex problem, we are very concerned with the continued siloed approach. This is a continuation of the problematic NCCRA approach and it is disappointing more has not been done to address this in the intervening years. We and many others including iwi, hapu and Māori organisations have continually raised this in previous submissions on climate change (and other legislation). **We are very frustrated that the Rauora report was commissioned by the Ministry, though at a late part of the plan process AND that no recommendations have made it into the plan.**

There does not seem to be a plan to change the framework to align with Te Ao Māori worldview within the governance section of System-wide Actions. We support the call for a holistic, integrated, iterative approach of the Rauora report. This must go beyond the supporting action (of the System-wide action) "Establish a foundation to work with Māori on climate actions" (p.29). **We believe as many others do, that our whole government and economic systems would benefit from an overhaul and with a Te Ao Māori framework going forward.**

The NCCRA acknowledged that our systems are interconnected and interdependent. Our traditional western methodologies need rethinking and redesigning, as it is clear they are not fit for purpose to rise to the adaptation challenge. **One focus must be on what systems are fit for purpose in a changing world.** Climate change has arisen under our current governance and economic systems and we do not believe that we can solve these issues, unless we address this part of the root cause.

Without reforming our institutions to be fit for a changing climate we will continue in a misguided growth paradigm, where climate investment will be put on hold when

economic conditions are poor, rather than acknowledging that this investment must continue regardless. **Without institutional reform, councils will continue to grant consents for dwellings that will be adversely affected by climate change in the coming decades, will reduce investment in essential infrastructure including reallocating road space from cars to bicycles and active transport.**

We think this plan does not address the most significant risk of the governance domain of the NCCRA (p.91) of the risk of maladaptive. “Reliance on practices that embed processes and tools which do not account for long-term uncertainty and change...”. **We need flexible planning and design to deal with high levels of uncertainty and change.** Our processes too often rely on data, modelling, certainty and cost-benefit analysis to make decisions. We do not think this approach is working and it is contributing to worsening wellbeing of our people and ecosystems. Our values and frameworks are fundamental for our decision makers.

Adaptation and mitigation are very closely interrelated. There is a lack of weaving these together in this plan. Many of the challenges we face for adapting to climate change, such as information accessibility, engagement and participation are the same for mitigation. **We must do both together, otherwise we face unintended consequences and make it harder for future generations to adapt and have a worsening climate.**

The holistic approach needs to be incorporated into our ecosystems plans. We need to look and plan at catchment, ecosystem and regional levels. For example our catchments and coasts are connected and management practices such as river gravel extraction can have consequences on coastal erosion. Our approach to date has been to constrain our rivers and as a result there has been a number of unintended consequences, like incision, flow increases and biodiversity decline. **Now is the time to put the wellbeing of our ecosystems central to our decision making.** To continue the example of the river, in many places giving the river more room to move has many co-benefits of reducing flood risk to surrounding areas and increasing biodiversity.

One of the few examples of a partial integrated approach in this plan is the case study on the urban heat island effect and some parts of the Natural Environment sections.

Our recommendations:

- Give effect to the Rauora Report and its recommendations. We need an interwoven approach of adaptation with our other challenges like biodiversity, mitigation and social issues. All of our society can benefit by this approach, as it puts the wellbeing of all at the centre and is a truly holistic approach.
- We recommend true co-creation and iterative, integrated approach going forward. Iwi and hapu, and communities throughout Aotearoa.

- We support a values based approach that puts the wellbeing of our people and ecosystems that we depend on first.
- We are beyond the point for voluntary standards and codes. Adaptation and mitigation must be taken into account for all decisions. Otherwise we will continue with maladaptive outcomes.

Healthy Communities and Mental Health

We support the development of a health national adaptation plan. This does however need to have a big focus on mental health, as from our experience we know this is a growing problem for our families and youth, who are increasingly anxious about climate change and their futures. Climate change is already impacting the mental health of millions of New Zealanders. **Climate anxiety, fear of the future and a general worrying about our collective future are negatively impacting lives.** This is not limited to those directly impacted by storms, floods and heatwaves. This anxiety spills over into people's lives, limiting their capacity to live meaningful and fulfilling lives and participate in their community. Lack of government action on climate change over the past three decades has both robbed us of a stable climate future, it has also robbed us of our peace of mind. **Taking urgent meaningful action to bend our emissions curve downwards while also adapting to the warmer future that is already baked in, is essential to free up the mental energy needed to bring people on the transformation journey.**

We note that mental health was identified as a major risk now (and into the future) in the NCCRA (p.68) and acknowledged that "fear and grief associated with climate change and expected loss itself can cause trauma".

Furthermore, we need an approach that also looks at the many positives of good community inclusive mitigation and adaptation solutions. There are many examples of how, done well, can lead to significant improvement in people's lives. A number of District Health Boards advocate for these co-benefits in their communities to their councils. **Examples of these health co-benefits include, improving walking and cycling infrastructure that leads to reduced air pollution, more physical activity and saving money on vehicles than can be spent on food and housing.**

We need to share our successes and the good work that is being done. We know there is a lot of good work going on around the country. Individuals, families, iwi and hapu, community collectives, companies and councils getting on with it. Celebrating our successes and learning from others to see what is possible really does help mental health.

Our Recommendations

- Health should be a key focus of adaptation and mitigation plans.
- Mental health of our youth and parents needs to be a key priority with the health plan.

- Leadership and action by central and local governments helps alleviate anxiety, particularly for our youth.
- Enabling people with good information and ability to participate in both mitigation and adaptation actions helps reduce anxiety.

Managed Retreat

Everything that we have stated above we recommend as important considerations in creating a framework for managed retreat. **We need the focus to be on people, community and ecosystem wellbeing.**

How we work together is crucial and communities, individuals and renters have responsibilities for adaptation too. **The needs and views of renters and community values are very important in how we adapt. Renters are a growing proportion of our society, it is very important they are not left out because they don't own "assets".** Everyone will be affected by adaptation and mitigation decisions, we will all have to adapt. We must understand and actively reduce barriers to participation from our least heard from and marginalised communities.

How decisions are made is just as important and what the constraints are on decision making. One of the key issues we see is how we navigate power imbalances and actively address and minimise them. This is key to a just transition. We need clear mandatory guidelines that weigh these needs highly. **An open and transparent process will help and one that is backed up with clear and ongoing communication and engagement in ways that work for all of our communities, especially those marginalised and vulnerable.**

We see a way to navigate these tough conversations and decision making. Good information is a key start, as we have mentioned repeatedly and where people have time to listen and be heard. **There must be a process for equitable representation and engagement, where the marginalised and vulnerable and our ecosystems are given high weighting in decisions.** We suggest there are clear bottom lines of what is unacceptable, such as no further degradation of ecosystems with an aim to increase their health.

Our Recommendations

- The starting point must be to enable communities by good accessible information.
- Facilitated community discussions. We have many skilled people in Aotearoa who are apt at facilitating difficult discussions. We should resource this facilitation.
- A framework on how power imbalances are identified and how these will be mitigated and monitored.
- A framework and constraints on the decision making in what values are central

- A wellbeing focus of both people and our ecosystems
- An intergenerational focus, where it is no longer acceptable to put the costs and impacts onto future generations.
- Some bottom lines on sharing costs, that recognise both ability to pay now and who has benefited from causing climate change in the first place. The most vulnerable and marginalised in our communities have historically contributed the least to emissions. These are the people in our community that we must help the most to adapt and give the biggest voice and weight into adaptation decision making.
- A governance model that has a holistic framework in keeping with the Te Ao Māori worldview

Thank you for reading our submission.

Ngā mihi,

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