



Conservation  
Council SA

The Parliamentary Officer  
Environment Resources and Development Committee

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9<sup>th</sup> April 2021

Dear Committee,

**Re: Inquiry into the Coast Protection Board and Legislation**

Thank you for the opportunity to submit to the Committee's inquiry into the Coast Protection Board and Legislation.

The Conservation Council SA is an independent, non-profit and strictly non-party political organisation representing around 60 of South Australia's environment and conservation organisations and their 90,000 members. Many of these organisations have a specific or partial focus upon coastal habitat protection and restoration.

The Coast Protection Board plays a very important role in mobilising State Government resources to protect South Australia's unique and socially, economically, and environmentally invaluable coastline.

Climate change is the most pressing challenge facing the long-term sustainability of our coastal habitat and integrity, and its impacts upon South Australian coastlines are predicted to be severe. The impacts of greatest concern to our coastal habitats will be from erosion caused by sea level rise and direct damage from increasing storm frequency and intensity.

As a result, the Coast Protection Board will face dramatically increasing claims upon its financial and technical resources over the coming years and decades. In particular, the need for technical coastal protection infrastructure knowledge and expertise in modelling coastal impacts from climate change will become increasingly important.

In addition, South Australia's coastal areas are important for their unique and varied biodiversity. Many of these attributes are under direct threat with critical species declining in population and distribution.

The social communication burden – communicating with locally affected stakeholders – can also be expected to increase over time as more South Australian residents are more seriously and directly affected by environmental impacts upon our coastlines from climate change and biodiversity loss. As with the

Native Vegetation Act, the Conservation Council SA is well-placed to assist in conveying local concerns, especially coastal environmental protection concerns.

The Board is currently insufficiently resourced, both financially and technically, to discharge these rapidly burgeoning responsibilities. The cost of infrastructure that mitigates and adapts to coastal impacts from climate change is projected will be a large proportion of that expected burden.

The Coast Protection Act 1972 (the Act) is long overdue for amendment in order to modernise and improve its operations. Conservation Council SA supports the submission of the Environmental Defenders Office (EDO) in respect to updating the purpose and scope of the Act, stronger acknowledgment of climate change in coastal planning and the reinstatement of the requirement for all development to be referred to the Board for their consideration.

The recent damage to the St Kilda mangroves, samphire and salt marsh provides a strong case study for the need for the Act to cover all State waters and offshore islands especially marine areas adjacent to coastal land including Spencer and St Vincent Gulfs.

### **Key points**

- The Climate Protection Board plays a critical role in mobilising State Government resources to address a variety of threats to our coastal environment.
- Climate change is the most pressing challenge facing the long-term sustainability of our coastal habitat and integrity. Sea level rise and increasing storm frequency and intensity are projected to be the most significant impacts upon our coasts from climate change.
- The functions of the board do not adequately allow for pre-emption or prevention of likely adverse impacts upon our coast, especially from climate change.
- Climate change mitigation and adaptation should be a central feature in the management plans prepared by the Board.
- The Board would benefit from increased access to key expertise in coastal protection infrastructure, modelling of the coastal impacts of climate change, and community environmental concerns.
- The Board is currently insufficiently funded to appropriately discharge its responsibilities; this shortfall of funds will only deteriorate further over the coming decades as the projected costs from coastal climate change mitigation and adaptation rise steeply.

### **Recommendations**

1. The functions of the Board (section 14(1)) should be amended to clarify that the Board can engage in activities which mitigate and adapt to the coastal impacts of climate change, or otherwise prevent or pre-empt likely adverse impacts from any source.
2. The purpose and scope of the Act should be updated to include Objects and to expand the scope to cover all State waters and offshore islands especially marine areas adjacent to coastal land including the Gulfs.
3. The Board should be expanded to additionally require:
  - a. A member who is qualified for membership of the Board by reason of extensive knowledge of, and experience in, the technical requirements of coastal adaptation, mitigation and protection infrastructure;

- b. A member who is qualified for membership of the Board by reason of extensive knowledge of, and experience in, modelling the coastal impacts of climate change; and
  - c. A member who must be a person selected by the Minister from a panel of three persons nominated by the Conservation Council of South Australia (a similar provision exists in the *Native Vegetation Act 1991 (SA)*).
4. Management plans prepared by the Board should be required to include:
- a. A statement of the key assumptions of the climate change modelling the Board has relied upon in formulating that plan.
  - b. How the expected impacts of climate change in the coast protection district will be addressed.
5. Advertisements relating to management plans (section 20(4)(c)) should be published on the internet, either instead or in addition to the current newspaper advertisement requirement.
6. The Board requires significant additional funding to discharge the increasing burden of its responsibilities that are and will result from climate change.

On behalf of the Conservational Council SA, I look forward to constructively engaging with the Committee and State Government on the future direction and enhancement of the Coastal Protection Board.

Yours sincerely,



Craig Wilkins  
Chief Executive

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