



Submission to AusAID on 'Aid and the Environment: Building Resilience; Sustaining Growth', a framework for an environment strategy for Australian aid

ACFID welcomes the opportunity to comment on the framework document for AusAID's Environment Strategy. Environmental issues are increasingly central to the the delivery of effective, sustainable development assistance, and ACFID commends AusAID on the work done on this strategy to date. We support the framework's focus on the three themes of climate change, water and environmental governance.

In general, we are also supportive of the analytical background within the framework, but would highlight the significant focus on the environment as an economic resource, while in contrast the analysis of social and ecological aspects of environmental management is relatively perfunctory. In the final Environment Strategy, ACFID would recommend greater attention to the importance of the environment to the health, culture and livelihoods of local communities. A number of reports by ACFID member agencies have highlighted this issue in recent years, for example:

- Oxfam Australia: Can the ADB save the Tonle Sap from poverty?
(http://www.oxfam.org.au/campaigns/adb/docs/tonle_sap_270406.pdf)
- Australian Conservation Foundation: Bulldozing progress
(http://www.acfonline.org.au/uploads/res_ACF-CELCOR_full.pdf)
- WWF Australia: World's top 10 rivers at risk
(<http://wwf.org.au/publications/worlds-top-ten-rivers-at-risk.pdf>)

Another general observation is that the linking together of Asian and Pacific Island States into one strategy tends to result in distorting generalisations. This is especially so in the case of climate change where the Pacific Islands are low greenhouse gas emitters compared to countries in Asia and indeed compared to Australia. In the case of water, the distortion associated with linking Asian and Pacific Island States under one strategy is evident in statements such as 'agriculture is the largest water user in Asia and the Pacific, accounting for 90% of consumptive uses overall' (p.20). Whilst such a statement can apply to Asia it is not appropriate in the case of Pacific Island States. Similarly, statements such as 'agriculture, domestic users and manufacturing industries place high demands on freshwater supplies in the Asia-Pacific region' (p.20) may well be true for Asia but cannot be applied to the Pacific. There is a need for a degree of differentiation within the strategy between the very different challenges facing these two regions and the different measures that may be required.

Climate Change

There is a focus in the framework document on research, analysis and education in relation to the impact of climate change on our region. These proposed measures are very welcome, but it is important to note that a great deal of research has already been carried out within Australia and internationally on these issues. A good example of this is the 2006 CSIRO report 'Climate Change in the Asia-Pacific Region' (http://www.ccdr.org.au/CCDR_Asia_Pac_Final.pdf), sponsored by the Climate Change and Development Roundtable. This research indicates a pressing need for action, simultaneous with more detailed research into long term measures being undertaken. Many Pacific Island States and low lying areas of Asia are already feeling significant impacts of climate change, including damage to coastal ecosystems, salination of agricultural land and exposure to more

extreme weather events. As the recent US report on 'National Security and the Threat of Climate Change' (<http://securityandclimate.cna.org/>) notes, 'many developing countries do not have the government and social infrastructures in place to cope with the types of stressors that could be brought on by global climate change'.

The research component in the framework therefore needs to be matched by strong and substantial short to medium term measures for climate change mitigation and adaptation in developing countries. In addition to foreshadowed initiatives in forest conservation and water management, this could include:

- Specific investment in partner government and civil society capacity to manage the economic, public health and other consequences of climate change.
- New livelihoods programs, particularly targeting resilience in the agricultural sector and alternative livelihoods for small producers whose farming becomes untenable.
- Major new investment in the transfer of renewable energy and other low emission technologies.
- Expansion of existing disaster preparedness measures, both within the Australian aid sector and in partner country systems.
- A strategy to manage migration pressures in the event of significant displacement of peoples through climate change.

Climate change scientists have emphasised that the next decade is the critical period for introducing measures to combat climate change. While AusAID allocated \$25 million for climate change related programs in 2006/07, we would now recommend increasing this to an amount of the order of \$200-300 million dollars per annum. This spending could be a mix of bilateral programs, NGO programs and contribution to international facilities such as the the UNFCCC Special Climate Change Fund, Least Developed Country Fund and other related mechanisms.

In relation to the monitoring and analysis of climate change in our region, the framework paper rightly acknowledges Australia's long history of engagement in environmental management initiatives in the region, especially in the Pacific. However, later statements in the paper relating to the need to 'update these analyses using current modelling methods and improved data' downplay the ongoing and up-to-date work that has been undertaken within the Pacific region by Pacific Island governments and through regional intergovernmental organisations such as the Secretariat of the Pacific Regional Environment Programme (SPREP) and the South Pacific Applied Geoscience Commission (SOPAC).

Pacific Island governments themselves have a long history of involvement in the Climate Change issue (e.g. representation by 12 Pacific Island Heads of State at the Earth Summit in Brazil in 1992) and commitment to climate change work at a time when the issue was not a high priority for many developed countries. It is therefore not quite correct to suggest that Australia is the repository of expertise in our region, in comparison with developing country neighbours. More credit and acknowledgement should be given in the Environment Strategy to the role Pacific Islanders themselves have taken in this regard, much of which has been with AusAID support.

Water

The commitments to improving water safety and availability and strengthening water resource management are most welcome. In recent years, Australia has significantly underspent on this area, in relation to the scale of the problem in our region. ACFID member agencies have at the same time been building up internationally recognised expertise in the water and sanitation area. An example of the sector's innovative approach is the collaboration of aid NGOs and Australian water supply utilities to form Water Aid Australia. Australian NGOs are therefore well placed to

contribute both technical expertise and implementation capacity with respect to improving water, sanitation and waste management infrastructure in the region.

The emphasis on Integrated Water Resource Management in the framework document is also welcome. Under this heading, we believe more emphasis should be placed on the linkages with appropriate regulation of mining, forestry and infrastructure activities. For example, it was disappointing that the Leading Practice Sustainable Development Tailings Management handbook recently developed by the Australian Government contains relatively weak environmental protection and community consultation measures, we understand largely as a result of lobbying by the Minerals Council of Australia. The result is that practices considered unacceptable in Australia (i.e. riverine and shallow submarine tailings disposal) continue to be carried out by Australian companies in developing countries, with sometimes devastating effects for the communities concerned. ACFID member agency Oxfam Australia has issued a number of reports on this subject, including:

- Mining Ombudsman Case Report: Tolukuma Gold Mine, Papua New Guinea
<http://www.oxfam.org.au/campaigns/mining/ombudsman/2004/cases/tolukuma/index.html>
- Mining Ombudsman Case Report: Vatukoula Gold Mine, Fiji
<http://www.oxfam.org.au/campaigns/mining/ombudsman/2004/cases/vatukoula/index.html>

In a related field, it is also important for Australia to play an active role in the governance of large scale multilateral activities such as the Asian Development Bank's Greater Mekong Subregion program. There has been considerable concern in civil society that the ADB's safeguards in relation to the environment, indigenous peoples and the displacement of communities are in the process of being watered down. As the fifth largest donor to the ADB, Australia has a responsibility to ensure that effective safeguards are maintained and that appropriate monitoring and evaluation of multilateral programs' impact on the environment takes place.

Environmental Governance

The framework acknowledges that environment agencies in many developing countries tend to be poorly resourced and sit low in hierarchies, lacking necessary authority, capacity and credibility to influence outcomes and discharge their mandates (p.24). The proposed response of building strong partnership and engagement in environmental impact assessment and management is a particular strength of AusAID's framework. We also support the proposals for research collaboration, scholarships and work placements and exchanges with regional and Australian institutions to target specific capacity building and knowledge gaps.

Similarly, recognition of the need to improve the presence and effectiveness of the Global Environment Facility (GEF) within the region is welcomed. Currently, the GEF is regarded by many Pacific Island States as a large bureaucracy with complicated and often inaccessible processes. The third suggested strategy, 'working to address the capacity issues associated with the introduction of GEF projects in the region' (p.25), we regard as of particular value.

The framework gives due consideration to the constraints on sound resource allocation and management, especially with regard to property rights and land tenure systems. It refers to the Pacific Land Program to help partner governments strengthen land systems within the context of customary tenure (p.26). We believe that an important component of the Environment Strategy should be efforts on the part of Australia to research and better understand the issues around customary tenure in Pacific Island States as a prelude to any significant reform proposals.

Overall, there should be more explicit consideration within the strategy of the need to engage with local civil society to promote 'bottom-up' environmental governance. As in other areas of aid delivery, a strategy that focuses overwhelmingly at the government level is unlikely to deliver the desired results, owing to inherent long term constraints on government effectiveness in many

neighbouring countries. The framework notes that in our region 'many human societies retain strong culturally-defining ties with their natural environment' (p.4), and in line with this sentiment we would like to see within the Environment Strategy greater acknowledgement of traditional environmental protection practices and their mobilising potential for environmental management. In addition, there should be specific recognition of the need for the free and informed consent of local communities concerning projects that would significantly impact on their way of life.

In discussing environmental governance within the framework document, there is also scope for greater acknowledgement of the pressure that large trading partners and transnational corporations can place on the environmental management regimes of smaller developing countries in particular. Enhanced Australian support for programs such as the Extractive Industries Transparency Initiative will be important to the building the international partnerships needed to overcome this imbalance in capacities. Robust scrutiny of the activities of Australian resources companies (discussed above) is also important in this respect.

Consultation process

This response on behalf of the ACFID membership is an important first step in our engagement with the AusAID Environment Strategy. It is, however, necessarily limited to certain key points, and we would welcome the opportunity to have further discussions on the issues raised, prior to the full Environment Strategy being developed. With many of AusAID's country and sectoral strategies, there have also been opportunities for multi-stakeholder face to face consultations, and we would commend this approach in the case of the Environment Strategy as well.

We would also like to see, as an integral part of the consultation process, early consultation with Pacific and Asian partners to gauge their views on how Australian aid can best help them address their environmental challenges. It is noted that the framework seeks alignment with national development priorities of developing countries and refers to in-country consultations. We urge the Australian Government to undertake such consultation at the earliest possible time and with a 'clean-slate' approach rather than with pre-conceived ideas on what Pacific and Asian partners may want from us. We particularly welcome the framework's suggested continuation of strong Australian support to regional organisations. In the case of the Pacific, such assistance to SPC, SPREP, FFA, SOPAC and other organisations will help ensure continued development of Pacific Islander capacity in the environment area.

Language considerations

ACFID would recommend that an organisation's own preferred spelling for its name be used, rather than using standardised Australian spelling. For example, SPREP uses 'Programme' in its title rather than the Australian 'Program'. This also applies to UNEP which also uses 'Programme'. FAO and WHO use 'Organization' in their titles rather than 'Organisation'. In addition, there are a number of references to the 'Asia-Pacific' rather than the more correct 'Asia-Pacific region'.

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Australia Council for International Development
April 2007