



POLICY SUBMISSION

EIANZ Submission on Climate Change Authority Discussion Paper on development of an Evidence Platform

About EIANZ

The Environment Institute of Australia and New Zealand (EIANZ) is Australasia's leading body for environmental professionals. We represent around 4,000 members and certified environmental practitioners in our region.

Our members come from a diverse range of technical professions, including scientists, policymakers, engineers, lawyers, and economists. They are at the forefront of issues such as impact assessment, biodiversity, climate change, and nature positive. EIANZ represents environmental practitioners at all stages of their career, from students and early career practitioners to senior leaders.

Executive Summary

EIANZ supports the Climate Change Authority's proposed Evidence Platform and commends the Authority for progressing this work.

The Platform would be most valuable if it became the core national infrastructure for climate decision-making, providing a consistent, transparent and trusted evidence base to assess progress against Australia's emissions reduction targets, including the 2030, 2035 NDC targets, associated sectoral and adaptation plans, and the 2050 net-zero goal.

From a practitioner's perspective, the priority is clear. The Platform must be useful, credible and robust. With this in mind, it must be pragmatically designed, built and maintained. Lessons learned and parallels with State of Environment Reporting should inform the evidence base.

EIANZ recommends that the Authority:

1. Commence with a focused, high-quality core set of indicators, anchored to 2035 (adaptation, mitigation and green growth) objectives including, Australia's NDC targets and Sectoral Plans
2. Address known gaps in emissions data, including Scope 3, heavy transport and synthetic refrigerant gases. The existence of gaps should be tested by mapping proposed indicators onto Australia's formalised climate change action program (e.g. NDC, Adaptation Plan, Sectoral Net Zero Plans etc)
3. Invest in practical, scalable metrics for adaptation, resilience and social equity
4. Include more leading indicators, particularly in domains and sectors where transition risk is high
5. Establish data integrity and QA/QC as foundational components and introduce a data confidence framework to communicate to users the reliability of the presented data
6. Leverage existing reporting structures and infrastructure, including AASB S2 and carbon market systems
7. Seek Government support for enabling legislation to codify the requirement to prevent neglect or defunding through changing government priorities.
8. Establish a formal stakeholder advisory mechanism to guide iterative and adaptive development

This submission responds to the Authority's consultation questions on platform design, metrics, data sources and governance.

1. Introduction

EIANZ welcomes the opportunity to respond to the Evidence Platform Issues Paper.

The Institute broadly endorses the development of the Platform as a mechanism to consolidate climate data, improve accessibility, and support informed decision-making across government, industry and the community.

Collating already available information into an easy-to-access platform will be valuable, as the resulting information gathered will inform both those working daily on the climate challenge and those with a more general interest in and concern for Australia's climate response. The platform will also reveal knowledge gaps in relation to the status of our climate programs.

From EIANZ's perspective, the absence of a consistent, trusted and accessible evidence-based premise has been observed to be a persistent gap in Australia's climate response.

The Platform also has a critical role in countering perceptions of greenwashing, by providing transparent, independently verified evidence on progress across sectors.

2. Overall Position

EIANZ supports the development of the Evidence Platform.

The Institute has identified the following features as critical to the success of the platform:

- Grounded in high-quality and credible data
- Properly governed (including through input from a wide range of users) and properly resourced
- Maintained, expanded and allowed to evolve over time, such as being interactive where useful.

3. Response to Consultation Questions

3.1 Platform Design and Indicator Selection

EIANZ considers the proposed design a strong starting point. The Platform should initially prioritise a manageable, high-quality core set of indicators, aligned to Australia's 2035 emissions reduction target and sector plans. As such, the Institute supports the initial development of a robust, but probably restricted set of indicators.

Australia's sectoral net zero plans and adaptation plans provide a practical and policy-relevant framework for indicator selection and should be explicitly used to guide the identification of indicators.

3.2 International Experience and Practical Constraints

New Zealand's experience with its national wellbeing indicators framework offers a cautionary lesson for the design of the Evidence Platform.^[1]

In 2018, Stats NZ began developing Ngā Tūtohu Aotearoa (Indicators Aotearoa New Zealand) as part of the then-government's commitment to measuring national progress beyond GDP. The ambition was commendable. Through extensive community and technical consultation, Stats NZ identified 109 wellbeing indicators organised across 22 topics, spanning current wellbeing, future wellbeing, international impacts and contextual measures.^{[2][3]}

The difficulty was that many of these 109 indicators did not have established collection methodologies in place at the time of selection. The framework was subsequently published with significant data gaps, and most indicators remained unfilled. When fiscal priorities shifted with the appointment of a new Minister, the gaps persisted, and the investment made in designing and consulting on those indicators was largely wasted.

Collecting high-quality data consistently is expensive. If the money dries up before a methodology is established and embedded, both the methodology and the investment are lost.

Three things follow for the Evidence Platform. First, start with indicators that can be populated from existing, regularly updated data. The overlay approach described below is one way to do this. Second, where a new collection is genuinely needed, sequence it by priority, starting at the top. Resource each new collection properly before starting the next - don't try to fill every gap at once. Third, don't publish a framework full of TBDs. A smaller set of consistently maintained indicators will be more useful to decision-makers and the public.

^[1] See dashboard here: <https://statisticsnz.shinyapps.io/wellbeingindicators/>

^[2] See consultation documents here: <https://www.stats.govt.nz/reports/indicators-aotearoa-new-zealand-nga-tutohu-aotearoa-key-findings-from-consultation-and-engagement/>

^[3] See underpinning conceptual framework here: <https://unece.org/statistics/publications/conference-european-statisticians-recommendations-measuring-sustainable>

3.3 Leading and Lagging Indicators

The Issues Paper recognises both leading and lagging indicators. However, the proposed metrics remain weighted toward lagging indicators. This is unfortunate as by default the harder to achieve areas and long lead items receive less visibility and the hard work that is required potentially gets passed onto the next generation.

EIANZ recommends prioritising leading indicators in areas where future performance risk is highest, including:

- Infrastructure and energy transition pipelines
- Heavy transport electrification and fuel switching
- Industrial decarbonisation pathways

Without these, the Platform will describe past performance but provide limited insight into whether the required sequence of necessary events (e.g. testing under local conditions, establishing enabling regulations etc) is on track.

3.4 Domain-Specific Observations

Emissions Reduction

Strong foundation, as would be expected by the effort that this domain has received over the past quarter of a century and the quantitative basis of the domain. It is important that the Evidence Platform maintains a proper balance between all four identified domains. Priority gaps we have identified in this domain include:

- Heavy transport, aviation and shipping emissions
- Scope 3 emissions
- Synthetic refrigerant gases, which are already reported under international obligations and represent a clear opportunity for inclusion

Proper mapping will likely identify other gaps

Adaptation and Resilience

This domain is critical but is underdeveloped and probably inadequately understood and undervalued by various sectors of the community. In addition, climate change is not the only stressor requiring individuals, communities and ecosystems to adapt. It is probable that, in comparison to the emissions reduction domain, a tight set of quantitative indicators cannot be developed to do full justice to this area. Our recommendation is that it is important to “go early but aim modestly” on indicators in this area.

EIANZ recommends establishing a minimum viable set of indicators, including:

- Heat-related health impacts
- Insurance coverage and protection gaps
- Infrastructure disruption metrics
- Providing some linkage to separate reporting on progress on our biodiversity plan and Kunming Montreal targets.

These can be refined over time, but early inclusion is necessary to avoid ongoing underrepresentation.

Green Growth

The green growth has obvious intersections with virtually all of the critical enablers. Green growth has social equity, economic, strategic, workforce and policy-related components. It is thus necessary that the “scope” of the green growth domain is restricted and well-defined (we suggest that where an indicator has both a green growth component and a critical enabler component, in the first instance, it should be considered a critical enabler indicator). Green growth in Australia will also be influenced by international competitiveness and other external influences. Accordingly, metrics for this domain will likely need ongoing evolution as the future unfolds.

This domain requires clearer anchoring in existing data systems. EIANZ recommends drawing on:

- Clean Energy Finance Corporation investment data
- ABS economic data, including emerging green economy measures
- Foreign direct investment data linked to decarbonisation

This will ensure the domain is measurable and aligned with economic outcomes.

Critical Enablers

This domain should focus on measurable system conditions that enable delivery, rather than broad concepts. Virtually all of the areas of the Critical Enablers Domain are influenced by or influence much more in the Australian community than climate change. The metrics need to be as specific as possible to the climate change component. Without this, focus and effort could become diluted.

EIANZ recommends prioritising indicators such as:

- Availability of finance for decarbonisation
- Policy coverage and stability
- Workforce capability metrics

Without this focus, there is a risk the domain becomes descriptive rather than actionable.

3.5 Data Quality and Existing Infrastructure

Data integrity is fundamental and EIANZ is disappointed that information and data isn't in the initial tranche of work. It is essential that the evidence platform is built with data integrity (in its broadest definition) front of mind. If data quality issues are identified in the first release of the platform, this will discredit the work, as well as requiring costly rework.

EIANZ recommends prioritising:

- Primary, verifiable data sources
- Transparent methodologies
- Integration with existing systems, including:
 - AASB S2 climate-related financial disclosures
 - Carbon market registries with traceability mechanisms

These systems provide a credible foundation and should be leveraged rather than duplicated.

3.6 Quality Assurance and Quality Control (QA/QC)

QA/QC must be treated as critical in the creation of the Platform.

EIANZ recommends:

- Formal QA/QC frameworks
- Clear accountability for data verification
- Regular review and audit processes

This is essential to maintain confidence in the Platform and, subsequently, usefulness.

3.7 Data Confidence and Transparency

EIANZ supports the introduction of a data confidence framework, such as a traffic light system, to communicate reliability.

This is particularly important where data is incomplete or evolving and in metric areas that have a qualitative component.

3.8 Governance and Legislative Support

EIANZ recommends:

- Legislative underpinning to ensure continuity. State of the Environment reporting should be reviewed as a useful regulatory model.
- An independent advisory panel with practitioner representation, this should also include the review of draft reports.

These measures will support independence and long-term credibility.

3.9 Sustainability and Resourcing

The Platform should be treated as ongoing national infrastructure.

This requires:

- Stable funding

- Continuous data collection
- Ongoing maintenance and refinement

Without sustained resourcing, the Platform risks losing relevance over time.

3.10 Social Equity and Adaptation Metrics

EIANZ considers that Australia may already hold more useful data on transition equity than is commonly assumed. The challenge is not solely the absence of data, but the need for better integration, interpretation and application of existing datasets. This requires both analytical capability and practitioner insight, reinforcing the value of a dedicated advisory function to guide this work.

Australia already holds high-quality primary data at the postcode level that, when combined appropriately, can show whether the benefits of decarbonisation are being shared across the community. No single dataset answers that question, though several datasets, used together, can provide a robust picture.

The ABS Socio-Economic Indexes for Areas (SEIFA) rank areas, down to the meshblock level, by relative advantage and disadvantage, drawing on Census data on income, education, employment and housing. The Clean Energy Regulator publishes postcode-level data on rooftop solar and home battery uptake. Electric vehicle registration data is also available by postcode.

In addition, collated NatHERS assessments for existing homes can indicate thermal performance, while CSIRO datasets provide insights into dwelling age, appliance choice and construction type. Data from sources such as the Energy Consumers Australia Consumer Energy Report Card can further inform household energy behaviours, including gas appliance uptake and replacement trends.

These datasets can be layered at the postcode or SA2 level to measure transition equity over time. For example, a postcode with high SEIFA scores, high solar penetration, rapid electric vehicle uptake and newer housing stock may indicate communities benefiting from the transition. In contrast, a postcode with low SEIFA scores, minimal solar uptake, limited access to electric vehicles and older housing stock may indicate communities facing greater barriers.

This approach demonstrates that meaningful equity indicators can be developed using existing data, rather than relying solely on new data collection.

EIANZ recommends that the Evidence Platform prioritise these types of data overlay and integration opportunities. This will enable more immediate insights, reduce cost and improve timeliness, while supporting more sophisticated analysis as the Platform matures.

4. Recommendations

EIANZ recommends that the Climate Change Authority:

1. Adopt a focused core indicator set, aligned to sector plans
2. Prioritise leading indicators in key transition areas
3. Continue to consult throughout the selection of metrics and the development of the framework.
4. Integrate existing data systems and reporting frameworks
5. Establish QA/QC as a core process
6. Establish a data confidence framework
7. Seek bipartisan support and legislative backing to ensure ongoing resourcing and maintenance
8. Establish an independent advisory panel to address data gaps, including heavy transport, Scope 3 emissions and synthetic refrigerant gases
9. Develop practical metrics for adaptation and social equity

5. Conclusion

EIANZ supports the development of the Evidence Platform and considers it a necessary and valuable initiative.

Its success will depend on whether it is implemented as a practical, credible and enduring system that supports decision-making across government and industry.

EIANZ welcomes the opportunity to continue contributing to its development.

Signatories



Fiona Gainsford FEIANZ GAICD CEnvP-IA + REAP
Vice President (Australia)
Environment Institute of Australia and New Zealand

Contact

Neil Mashman
Chair of the Climate Change Special Interest Section
Environment Institute of Australia and New Zealand
Email: office@eianz.org
Website: www.eianz.org