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Victoria's draft Adaptation Action Plans 2027-31 – Public Consultation

The Royal Society of Victoria (RSV) welcomes the opportunity to comment on the eight draft Adaptation Action Plans 2027–31 (the Plans) released for consultation in June 2026, and on Victoria's Climate Change Strategy 2026–30 that frames them. As Victoria's scientific society, the RSV's interest is in whether the Plans rest on sound evidence and whether they will measurably reduce climate risk for Victorians.

We have considered the Plans through the lenses of four of our constituent groups

- Scientists concerned with evidentiary rigour
- Metropolitan (Melbourne) residents
- Regional residents whose livelihood depends on agriculture and healthy natural ecosystems
- Taxpayers concerned with value for money and the long-term budget

Overall Assessment

The Plans are founded on the science of climate change but in their current form they appear to be more of a planning and information exercise rather than a risk-reduction program. They describe Victoria's climate hazards accurately and draw consistently on authoritative evidence - the IPCC Sixth Assessment Report, Victoria's Climate Science Report 2024, and the National Climate Risk Assessment 2025. The newly separated Energy plan is a sensible addition given the centrality of energy to every other system.

However, the great majority of the committed actions are “enabling” - guidance, toolkits, risk assessments, embedding climate in decision-making, knowledge-sharing and advocacy - rather than “direct” actions that physically reduce exposure. The Plans themselves adopt this taxonomy and rightly note that enabling actions are foundational. Our concern is one of balance. Almost no new funding is attached to the Plans, no action carries a target, cost or completion date, and there is no published monitoring or evaluation framework. As a result, it remains unclear how success will be measured or whether the Plans will deliver meaningful reductions in climate vulnerability.

Comments From Perspective of RSV's Constituents

1. The Scientist

The hazard science is current and correctly characterised, including the counter-intuitive but well-established increase in short-duration rainfall intensity against an overall drying trend, compounding and cascading events

(the concurrent January 2026 bushfires, heatwave and flooding are used effectively), and the risk of ecosystem tipping points. The weaknesses are evidentiary discipline at the delivery end: the Plans nominate no climate scenario or planning horizon against which adequacy could be judged, set no indicators or baselines, and assert rather than demonstrate the chain from evidence to prioritisation to action.

2. The Metropolitan Melbourne Resident

The measures a resident would actually feel are concentrated in the Energy and Health plans - minimum energy-efficiency standards for rental homes from 1 March 2027 (benefiting the roughly one-third of Victorians who rent), social-housing thermal upgrades and electrification, the Victorian Energy Upgrades scheme, neighbourhood batteries, and network-resilience reforms to curb the prolonged outages of 2021 and 2024. Built-environment planning reforms (a 30% urban tree-canopy target, urban cooling and greening) address the urban heat island, which the evidence identifies as the city's deadliest climate hazard. For the median owner-occupier or private renter, however, most of the package is information and guidance rather than tangible help, and suburb-scale cooling and heat refuges are largely absent.

3. The Regional Resident

Producers are reasonably well served by the plans: the Primary Production plan is the most concrete, with on-farm trials, drought-resilience planning, irrigation modernisation, biosecurity and the \$2.1 million Farming Safe and Well program, and the Energy plan's outage-resilience work matters across the regions.

The natural ecosystem side is not well served: every action in the Natural Environment plan is enabling, with no funded on-ground restoration or biodiversity protection, despite the same plan warning of the near-certain collapse of some ecosystems by 2050. The threat regional Victorians will feel first - insurance becoming unaffordable or unavailable - is named in several Plans but met only with advocacy to the Commonwealth.

The Plans' treatment of regional risk focuses on agriculture and insurance, but is silent on the adaptation needs of communities whose economic base is tied to the energy transition itself, such as the Latrobe Valley. The RSV recommends a funded, adaptation-specific workforce and community transition plan for these regions, distinct from existing emissions-focused transition programs.

4. The Taxpayer

An enabling-first approach is, on its face, good value: it leverages spending that government and others would make anyway and reflects the well-evidenced finding that prevention is far cheaper than recovery (the Insurance Council of Australia estimates roughly a \$9.60 return for every \$1 invested in resilience). But value cannot be verified without costings, targets or metrics, and some actions restate existing programs. Victoria's Climate Change Strategy's headline economic case (a projected \$63 billion higher Gross State Product) relates to emissions reduction, not adaptation. The principal fiscal risk is the unfunded liability the Plans leave unresolved: by deferring the expensive decisions - managed retreat, asset hardening, insurance - to guidance and advocacy, the eventual disaster-recovery bill on the State's balance sheet continues to grow.



The Aspects RSV Most Strongly Supports

1. **A scientifically grounded, prevention-first framing.** The Plans consistently use authoritative climate evidence and adopt the principle that acting early to reduce risk is more effective and far cheaper than responding to disasters. This is the correct foundation and the RSV endorses it without reservation.
2. **Tangible, equitable home- and energy-resilience measures.** Minimum energy-efficiency standards for rental homes, social-housing thermal upgrades and electrification, the 100 Neighbourhood Batteries Program and electricity-network resilience reforms are concrete, reach the most vulnerable households, cut both heat exposure and energy bills, and represent strong value for public money. They are the clearest example of the Plans delivering benefits that Victorians will actually notice.

The Changes RSV Would Like To See

1. **A clear statement of the climate scenario(s) and planning horizon used for each Plan.** This will enable the public to see what level of change the actions are designed to address.
2. **Targets, costings, indicators and a public monitoring and evaluation framework attached to every action.** Without these the Plans cannot be held to account, their adequacy against a stated warming scenario cannot be assessed, and taxpayers cannot judge value for money. The RSV recommends each action specify an expected risk-reduction outcome, a measurable indicator and baseline, an indicative cost and a completion date, with progress reported publicly and the overdue 2022–26 evaluation released.
3. **Rebalancing from enabling actions toward funded, direct, on-ground action - starting with ecosystems and transport.** The Natural Environment plan in particular should commit funded restoration and biodiversity measures commensurate with the collapse risk it describes, and the Transport plan should move beyond high-level principles to specific, prioritised infrastructure interventions (for example, a public schedule for heat- and flood-hardening of the most exposed rail and road assets, particularly those critical to emergency evacuation, with resilience standards reported as part of routine asset renewal).
4. **Confronting the insurance and unfunded-liability problem directly.** Rather than relying on advocacy to the Commonwealth, the State should set out its own plan for the affordability and availability of insurance, managed retreat from the highest-risk locations, and the hardening of public assets - so that the growing disaster-recovery liability is actively reduced rather than deferred. This should be accompanied by stronger cross-system coordination (the Plans repeatedly note cascading risks but are delivered in departmental silos) and correction of the drafting and quality-control defects noted below.

The absence of costings, targets and timelines risks being more than an oversight: without measurable accountability, there is no political cost to under-delivery, and diffuse future taxpayers and ratepayers have no organised voice in the way that established energy and resource sectors do. The RSV recommends the Department treat this asymmetry as a design problem to be corrected through public reporting, not left to be resolved by advocacy alone.



Other Observations

The social-housing energy-efficiency program is described inconsistently across Plans - as a \$209.4 million / 50,000-upgrade program in the Energy plan and a \$346.6 million / 60,000-upgrade program in the Health and Human Services plan. The figures should be reconciled and a single authoritative statement used.

The Way Forward

The Royal Society of Victoria would welcome the opportunity to discuss this submission and to assist the Department in strengthening the evidence base and evaluation of the Plans.

Furthermore, we invite the Department to make use of the RSV as an independent convenor of opinions and debate. Throughout Victoria's history we have brought together industry, academia, government and the public to explore and debate societal issues. How the state adapts to climate change, and, critically, how those plans are translated into tangible action, represents a significant opportunity for partnership. We would welcome the chance to work with the Department to explore and inform this agenda.

Yours sincerely,

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President

Royal Society of Victoria