

Adaptation Plan team
Department of Energy, Environment and Climate Change
Via online submission
Cc: climate.change@deeca.vic.gov.au

14 July 2026

Dear Adaptation Plan team,

RE: Submission on Victoria's draft *Natural Environment Adaptation Plan 2027-2031*

The Australian Land Conservation Alliance (ALCA) welcomes the opportunity to provide a submission on Victoria's draft *Adaptation Action Plans 2027-31* – in particular, the *Natural Environment Adaptation Plan* (the Plan).

ALCA represents organisations that work to conserve, manage, and restore nature on privately managed land. The conservation efforts of our 23 member organisations have influenced over 9.3% of Australia with more than 4,000 landholders; we have over 70,000 supporters and our combined annual turnover exceeds \$400 million.

Together, ALCA and our members address the most pressing conservation issues across the country, by restoring endangered ecosystems, building the protected area estate, tackling invasive species, expanding private conservation finance, and deploying nature-based solutions to mitigate climate change.

ALCA is happy for this submission to be published in full.

Summary

Alongside land use change (i.e. habitat destruction) and invasive species, climate change presents a great threat to Victoria's biodiversity – to the survival of its unique species and ecosystems – as well as to the wellbeing of all Victorians who collectively depend upon nature to sustain their food security, their health, and their livelihoods.

Protection, management, and restoration of biodiversity on private, public, and Indigenous lands is a key land management opportunity to sequester carbon at scale, whilst simultaneously delivering climate change adaptation and resilience. The value of investing in these types of nature-based solutions for adaptation and mitigation to climate change is well-recognised by the Australian Federal Government:

“Investing in nature-based solutions for adaptation and mitigation to climate change provide multiple benefits including:

- *protecting biodiversity and threatened species,*
- *contributing to climate mitigation through carbon sequestration,*

- *making communities more resilient to climate change,*
- *contributing to food security, and*
- *supporting businesses reliant on healthy ecosystems such as fishing, tourism and agriculture.”¹*

These nature-based solutions must be a key element of Victoria’s adaptation planning and its implementation. As such, our key recommendations for the Plan are:

- **Recommendation 1:** The Plan should explicitly recognise the importance of conservation (i.e., environmental protection, management and restoration) in the delivery of climate change adaptation. Further, it should recognise the alignment with targets in the Victorian Government’s *Protecting Victoria’s Environment – Biodiversity 2037* and its supporting technical supplement document².
- **Recommendation 2:** The inclusion of nature-based solutions (page 15) should be bolstered and expanded, based on the multiple benefits this approach provides. ALCA would be happy to provide further detail on what could be included.
- **Recommendation 3:** Existing entities and programs that are already delivering nature-based solutions for climate adaptation – via protection, management, and restoration of high-value conservation lands – should be supported and expanded as part of the implementation of the Plan.

Regarding the consultation questions, we note that these predominantly relate to identifying the ‘most important elements’ within the plan, e.g., the most important risks, opportunities, and actions. While prioritisation is a valid approach, especially where resources such as time and investment are limited, we would like to highlight that successful climate adaptation will require a multi-pronged approach: working in parallel on multiple actions across multiple risks and opportunities, and with multiple stakeholders. This suggests a balance is required between prioritisation and a diversity of adaptation approaches, and this should be considered in line with our responses below.

Consultation Questions

1. Of the 9 adaptation priorities that the plans respond to, which priorities are most important to you?

Of the priorities listed in the plans, those that are most important to ALCA are those relating to conservation and the natural environment. Namely, the three priorities aligned with ‘Protecting kids, families and communities’:

- Focus on climate-related risks to Victoria’s natural environment and implement strategies to maximise biodiversity conservation and support ecosystem services;

¹ <https://www.dcceew.gov.au/climate-change/policy/nature-based-solutions-for-climate>

² <https://www.environment.vic.gov.au/biodiversity/biodiversity-plan>

- Support nature-based solutions that connect Victorians to the natural environment, reduce emissions and build climate resilience; and
- Support emergency management and preparedness for more frequent and intense climate-related events.

2. How can the Victorian Government support your top adaptation priorities?

The Victorian Government can support these priorities by investing in and enabling actions that strengthen the resilience adaptability of ecosystems across public, private and Indigenous land.

In particular, the Government should:

- expand and support protection and conservation of high-value natural areas through public protected areas, Indigenous Protected Areas and private land conservation mechanisms;
- invest in restoration of degraded ecosystems and landscape connectivity projects that improve the capacity of species and ecological communities to respond to climate change;
- increase support for nature-based solutions that simultaneously deliver biodiversity conservation, carbon sequestration, climate adaptation and community resilience outcomes;
- continue strengthening preparedness for climate-driven emergencies, including bushfire, flood and drought, through improved planning, monitoring and partnerships with land managers;
- strengthen the capability of organisations and landholders already managing natural assets through access to information, training, decision-support tools and long-term funding; and
- leverage existing expertise within the conservation sector to accelerate adaptation planning and implementation.

Victoria already has a highly capable network of non-government conservation organisations, Traditional Owners, landholders and community groups actively protecting, restoring, and managing landscapes. Supporting these actors to scale adaptation action represents a significant opportunity for cost-effective implementation of the Plan.

The following questions relate to the Natural Environment Adaptation Plan specifically.

3. Which climate risks do you consider most important for the government to act on?

The Natural Environment Adaptation Plan identifies many of the key risks associated with climate change impacts on the natural environment (pages 10-13), including changes to distribution, structure, composition and function of natural ecosystems.

While ALCA is not putting forward a view on which of the relative importance of each of these, we note that many of these are inherently interlinked – and changes in one risk are likely to have flow-on implications for other risks. As such, approaching the natural environment as a connected system – and ensuring the resilience, diversity and health of that system as a whole – is an effective framework for approaching climate adaptation of the natural environment.

ALCA also emphasises the risk of compounding pressures and cumulative impacts, where climate change interacts with existing threats such as invasive species, habitat loss, altered fire regimes and declining ecosystem condition. Adaptation responses should therefore seek to address these threats together, rather than in isolation.

4. Which opportunities do you consider most important for the government to act on?

As noted above, nature-based solutions provide an opportunity to deliver multiple benefits and should form a key component of natural environment adaptation in Victoria. Expanding Victoria's protected area estate (private, public, and Indigenous Protected Areas) is a key solution in this regard, and an opportunity exists to transition Victoria's state forest estate into protected areas³ – thereby increasing their resilience to climate change impacts, as well as their ability to adapt to climate change.

Victoria has a significant opportunity to expand climate adaptation efforts through private land conservation. Many important ecosystems, wildlife corridors, climate refugia and biodiversity assets occur outside the public reserve system. Supporting conservation covenants, stewardship mechanisms, private protected areas and restoration programs can deliver substantial adaptation benefits while complementing public conservation investments.

There is also an opportunity to better integrate adaptation objectives into existing biodiversity, restoration and conservation investment programs. Doing so can maximise co-benefits and reduce duplication between climate adaptation, biodiversity conservation and emissions reduction initiatives.

In addition, there is also a significant opportunity to leverage and support the existing expertise and capabilities within the environment sector. This sector has had many decades of experience researching, protecting, managing and restoring the environment – including adaptation to climate change. Ensuring this knowledge and capability is effectively utilised to support adaptation efforts for the natural environment is critical, as is supporting these organisations and individuals to undertake climate change adaptation activities.

5. Which actions do you consider most important for building resilience of the system of interest?

Multiple complementary actions will be required to enable Victoria's natural environment to adapt to climate change. We are pleased to see that Nature-Based Solutions are listed as a current adaptation action (page 15), as well as supporting future actions (page 17). However, it is less clear as to the details of what this includes and how it will be implemented. ALCA encourages greater emphasis on this, and on associated on-ground implementation measures

³ Further details available in ALCA's submission on the future of Victoria's state forests, 24 Dec 2024; https://alca.org.au/wp-content/uploads/2025/01/20242412-ALCA-submission-The-future-of-Victorias-state-forests_web.pdf

that directly increase ecological resilience, such as those listed in Q2 (expanding and strengthening protected area networks; restoring degraded ecosystems; and improving habitat connectivity across landscapes). A focus on protecting and enhancing climate refugia; supporting threatened species recovery; and controlling invasive plants and animals will also be important. These actions will improve the ability of species and ecosystems to resist, recover from and adapt to climate-related disturbances.

At a broader landscape level, encouraging best-practice natural resource management approaches across agricultural landscapes, including retention and restoration of native vegetation, riparian management, soil health improvement, shelterbelts, revegetation and integrated landscape-scale planning will be important.

ALCA encourages DEECA to progressively extend the application of the Climate Adaptation Lens beyond government-led programs. Future implementation should consider how the Lens, or a simplified version of it, could support adaptation decision-making by private landholders, conservation organisations, Traditional Owners, local government and natural resource management practitioners.

6. Do you have any further feedback on the actions in the plans? This could include feedback on how the actions could be implemented and who to engage during implementation.

ALCA supports the overall direction of the draft *Natural Environment Adaptation Plan* and its emphasis on building adaptive capacity, improving decision-making and supporting transformational adaptation where required.

Greater clarity is needed, however, regarding how the Plan aligns with broader climate mitigation, biodiversity conservation and nature repair initiatives. Climate adaptation should not be considered in isolation. Many of the actions needed to improve ecological resilience – including protection of native vegetation, expansion of protected areas, restoration of degraded landscapes and management of invasive species – deliver adaptation, mitigation and biodiversity outcomes simultaneously. The Victorian Government should therefore ensure strong alignment between implementation of this Plan, *Victoria's Climate Change Strategy*, *Biodiversity 2037* and relevant Commonwealth initiatives. This will improve efficiency, leverage investment opportunities and deliver more durable outcomes for Victoria's natural environment.

In addition, investment by government to support these actions will be needed, to complement other sources of funding such as markets, private investment, etc. The implementation of the Plan should recognise the opportunity to scale up existing programs to deliver on climate change adaptation, such as:

- the Nature Fund, which leverages private and philanthropic investment to protect Victorian nature⁴, and delivers climate mitigation and adaptation through that protection;
- the Australian Government's Australian Bushland Program⁵, which offers the Victorian Government the opportunity – via state-based investment vehicles such as the Nature

⁴ <https://www.environment.vic.gov.au/nature-fund>

⁵ <https://parlinfo.aph.gov.au/parlInfo/search/display/display.w3p;query=Id%3A%22media%2Fpressrel%2F10225815%22;src1=sm1>

Fund (as above) – to leverage federal and philanthropic funding for acquisition of property for the protected area estate;

- the BushBank program, which revegetates land to reduce carbon emissions, improves climate resilience and adaptability, and create habitat for some of Victoria's most iconic species⁶;
- investment in the Victorian statutory entity, Trust For Nature, which protects and restore nature on private land in Victoria⁷, and delivers improved resilience and adaptability through that protection and restoration; and
- utilisation of the Victorian Property Fund, such that private land transactions could invest in private land conservation and increase climate mitigation and adaptation through that conservation activity.

Thank you again for the opportunity to provide a submission on the draft *Adaptation Action Plans 2027-31* – in particular, the *Natural Environment Adaptation Plan*. ALCA and its members look forward to continuing to engage with the Victorian Government in the development of the Natural Environment Adaptation Plan.

Australian Land Conservation Alliance

⁶ <https://www.environment.vic.gov.au/bushbank>

⁷ <https://trustfornature.org.au/>

About the Australian Land Conservation Alliance

The Australian Land Conservation Alliance is the peak national body representing organisations that work to conserve, manage, and restore nature on privately managed land. We represent our members and supporters to grow the impact, capacity, and influence of private land conservation to achieve a healthy and resilient Australia.

Our twenty-three member organisations are:

- Arid Recovery
- Australian Wildlife Conservancy
- Biodiversity Conservation Trust NSW
- Biodiversity Legacy
- Bush Heritage Australia
- EcoGipps
- GreenCollar
- Greening Australia
- Landcare Australia
- Nari Nari Tribal Council
- National Landcare Network
- Nature Foundation
- North Australian Indigenous Land and Sea Management Alliance
- NRM Regions Australia
- Odonata
- Queensland Trust for Nature
- Rainforest Rescue
- South Endeavour Trust
- Tasmanian Land Conservancy
- The Nature Conservancy Australia
- Trust for Nature (Victoria)
- World Wildlife Fund – Australia
- Wildlife Bank Trust

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ALCA represents organisations that work to conserve, manage, and restore nature on privately managed land. The conservation efforts of our 23 member organisations have influenced over 9.3% of Australia with more than 4,000 landholders; we have over 70,000 supporters and our combined annual turnover exceeds \$400 million. Through their active land management, ALCA member organisations are deeply embedded in rural communities and economies, providing jobs, securing significant regional investment, and safeguarding remaining native habitat, with its many positive spillover effects for community, wellbeing, and food security. We seek to demonstrate the role and value of private land conservation as a cornerstone of the Australian economy.

Some ALCA members are statutory entities; the views expressed in this submission do not necessarily represent the views of the Government administering those statutory entities.