Climate Council of Australia

Submission to:	Victoria's 2026-30 Climate Change Strategy
Addressed to:	Victorian Government Department of Energy, Environment and Climate Action
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About the Climate Council

The Climate Council is Australia's own independent, evidence-based organisation on climate science, impacts and solutions.

We connect decision-makers, the public and the media to catalyse action at scale, elevate climate stories in the news and shape the conversation on climate consequences and action, at home and abroad.

We advocate for climate policies and solutions that can rapidly drive down emissions, based on the most up-to-date climate science and information.

We do this in partnership with our incredible community: thousands of generous, passionate supporters and donors, who have backed us every step of the way since they crowd-funded our beginning as a non-profit organisation in 2013.

To find out more about the Climate Council's work, visit www.climatecouncil.org.au.

Introduction

The Climate Council welcomes the opportunity to contribute to the development of *Victoria's 2026-30 Climate Change Strategy*. As an independent, evidence-based organisation, we strongly support action that aligns with the latest science and maximises benefits for communities, the economy and environment.

In the first months of this year, Victorians have experienced climate whiplash, with the state almost simultaneously experiencing heatwaves, fires, storms and flash floods. While fires in the summer season are common, climate pollution is making rapid, wild swings in conditions more likely. Without urgent action to cut climate pollution, extreme weather conditions like these will intensify, creating more disruption, dislocation, devastation and loss of life.

Victoria's next statewide climate change strategy will take us through to the end of this critical decade for climate action. The strategy must set the direction for rapid cuts in climate pollution by phasing fossil fuels as fast as possible, and replacing them with technologies that we already know work.

We note that Victoria recently brought forward its net zero target from 2050 to 2045, with interim targets including a 45-50% reduction on 2005 levels by 2030. While this is an improvement on Victoria's previous targets, it is not nearly enough. To avoid the worst impacts of climate change, Australia must cut climate pollution by 75% on 2005 levels by 2030, and to net zero by 2035 (Climate Council 2024a).

As one of Australia's largest polluting states, accounting for 20% of the country's emissions, Victoria needs to step up its climate ambition and play its part in meeting globally agreed goals. The Climate Council recommends seven priority areas to strengthen and build on existing work through Victoria's next climate change strategy.

With around 90% of Victoria's climate pollution coming from the burning of fossil fuels (Victorian Government Department of Energy, Environment and Climate Action (DEECA) 2024a), our recommendations are focused on enabling a rapid transition away from coal, oil and gas. Importantly, this can be done in ways that benefit Victorians, by putting downward pressure on power bills and creating employment opportunities, among many other economic and social benefits. Cutting Victoria's agriculture and land emissions and increasing the state's resilience to the impacts of climate change should also remain priorities in the next strategy.

We note that the Victorian Government is also due to develop new sectoral emissions reduction pledges this year. We encourage the Government to consider the following recommendations as part of the development of the sector pledges where relevant.

For more information on many of these recommendations, see the Climate Council's *Seize the Decade* Report, which identifies practical actions that governments at all levels can take to reduce Australia's climate pollution by 75% by 2030: https://www.climatecouncil.org.au/resources/seize-the-decade/

Recommendations

1. Help cut the cost of living for Victorians while slashing climate pollution with rooftop solar and batteries

- Install free solar and batteries on public housing
- Support Victorians who can't install their own solar and batteries to access community solar banks, gardens and batteries
- Collaborate with other governments to require solar and storage on certain new buildings

2. Enable a rapid increase in large-scale renewables through meaningful community engagement

- Enable community-led hosting of renewable energy infrastructure
- Fund Community Energy Coordinators in local government areas within Renewable Energy Zones (REZ)

3. Keep up the momentum and get Victorians off gas

- Reduce demand for gas and commit to stop offering new exploration licences for onshore gas exploration

4. Support Victoria's manufacturing businesses to cut climate pollution, reduce operating costs and stay competitive

- Actively engage with large gas users
- Support businesses to access professional advice
- Expand the Victorian Energy Upgrades (VEU) Program

5. Accelerate the move to shared and active transport

- Implement key recommendations in Victoria's draft 30-year infrastructure strategy

6. Protect and restore Victoria's landscapes

- Strengthen regulations to reduce land clearing on private land
- Increase council resourcing to improve enforcement and early intervention of illegal land clearing
- Continue to invest in research, development and extension for low emissions agriculture solutions

7. Adapt and build resilience to the impacts of climate change

- Develop a state disaster mitigation plan
- Assess local government disaster preparedness, response and recovery capacity and capability
- Examine the feasibility of developing a Victorian Household Resilience Program

1. Help cut the cost of living for Victorians while slashing climate pollution with rooftop solar and batteries

As Victoria progresses towards its renewable energy target of 95% by 2035, rooftop solar backed up by storage will play an increasingly important role in the state's power system. However, currently, only around 28% of Victorian houses have solar, well behind most other jurisdictions. Around 1% of Victorian homes have both solar and a battery (Climate Council 2024b).

Rooftop solar and batteries are not only essential to ongoing energy reliability, they also provide much needed cost-of-living relief. Australian households with rooftop solar can save up to $1,500 a year, and those with a battery can almost double their savings. Batteries also help protect from power prices spikes driven by reliance on fossil fuels - from 2022 to 2023, households without solar or storage were hit with a $500 average increase in power bills, compared to $300 for those with rooftop solar and only $100 for those with solar and a battery (Climate Council 2024c). With appropriately targeted initiatives, rooftop solar and storage can also help build a more equitable energy system and save the Victorian Government money through the reduced need for power bill concessions. Climate Council analysis has found that rooftop solar on social housing could save the Victorian Government and its social housing tenants a combined $43 million (Climate Council 2024c).

We welcome Victoria's existing initiatives to incentivise the uptake of solar and batteries, and help more Victorians access the benefits - including those in social housing, renting and in apartments. Policies the Victorian Government could implement to build on these initiatives include:

- **Install free solar and batteries on public housing:** Use Victoria's Green Bonds to finance the upfront cost of installing solar and batteries on all state-owned public housing properties. As this would reduce power bills for social housing tenants, there would be less need for ongoing energy rebates and the repayment of the green bonds could be met through the savings. This would also provide an ideal opportunity to connect the solar and batteries to form a Virtual Power Plant (VPP) and contribute to a more resilient and reliable power grid for all Victorians. In South Australia, the SA VPP is saving more 5,500 Housing SA homes up to $550 each, every year on their power bills, while also contributing to more affordable and reliable electricity across the state.

- **Support Victorians who can't install their own solar to access community solar banks, solar gardens and batteries:** Enable Victorians renting, living in apartments or with roofs unsuitable for solar to access the benefits through solar gardens, solar banks and community batteries. For example, the Haystacks Solar Garden in New South Wales is saving its solar gardeners an estimated $505 every year off their power bills, and was supported through the New South Wales Government's Regional Community Energy Fund.

- **Collaborate to support regulatory reforms:**
    - Support the National Construction Code (NCC) 2025 reforms to require commercial buildings include rooftop solar, and consider circumstances where on-site energy storage (or building features to enable future on-site energy storage) should be required.
    - Advocate to other states and territories, and the Federal Government, for the NCC to require all suitable new and substantially rebuilt homes to have rooftop solar.

2. Enable a rapid increase in large-scale renewables through meaningful community engagement

Almost half (48%) of Victoria's climate pollution comes from the burning of fossil fuels to make electricity (DEECA 2024a). Victoria's three remaining coal plants are ageing and unreliable, and are a major driver of power outage risk in the state (Climate Council 2024d). All three will need to close in order for Victoria to meet its target of 95% renewable electricity generation by 2035. The Victorian Government must rapidly bring on new renewable generation and storage this decade to ensure Victorians can access reliable, clean power.

Victoria has made progress to increase renewable generation, with 40% of its power now coming from renewables - more than Australia's other big states (Climate Council 2024b). Thanks to the state's investment in renewables to date, as well as its interconnectors which import cheap power from other states, wholesale power prices in Victoria have been the lowest on the east coast of Australia since 2020 (Wood 2025).

The recent planning reforms to enable efficient and timely approvals for clean energy projects, together with the work to establish renewable energy zones (REZ) and offshore wind zones, are positive steps. The successful establishment of offshore wind zones will be essential to the state's - and the country's - transition to renewable power.

However, further work is needed to accelerate the rollout of REZs. To do this, the Victorian Government must ensure renewables are delivered in ways that benefit communities, and foster community and social licence for these important developments. The Victorian Renewable Energy Zone Community Benefits Plan, due to be completed in early 2025, is a significant step in the right direction. To build on this, we recommend that the Victorian Government:

- **Enable community-led hosting of renewable energy infrastructure:** establish processes to call for community-led submissions and proposals on where renewable energy infrastructure and storage projects should be located. This could be done in collaboration with local governments, to identify communities or regions which are keen to host new energy infrastructure and share in the benefits. It could also involve business and community groups to identify commercial, industrial and large-scale community sites which are suitable for hosting rooftop solar at scale.

- **Fund Community Energy Coordinators in local government areas within Renewable Energy Zones (REZ):** these coordinators would be a dedicated contact point for project proponents and an accessible liaison for community members, helping to increase dialogue, information and knowledge sharing about the design and delivery of new energy infrastructure.

3. Keep up the momentum and get Victorians off gas

With the burning of gas contributing 16% of the state's climate pollution, and around 2 million gas users - the highest in the country (DEECA 2024b) - it is essential that Victoria gets off gas as fast as possible. This will not only cut climate pollution, but will save Victorians significant amounts of money and assist with energy security. Analysis by the Institute for Energy Economics and Financial Analysis (IEEFA, 2023) found that Victorian households could reduce their energy bills by up to $1,200 by switching gas heating, hot water and cooking appliances to efficient electric alternatives.

We commend the Victorian Government for its Gas Substitution Roadmap and its decision to phase out of gas in new homes from last year. The Climate Council's 2024 *Race to the Top* report recognised Victoria as a nation-leader on electrification. Importantly, Victoria's switch to electric sets a strong example for other jurisdictions to follow.

The Victorian Government must continue to implement the Gas Substitution Roadmap and phase out gas use in homes, business and industry as fast as possible. We welcome progress to date, such as the recent consultation on the Building Electrification Regulatory Impact Statement that proposes to require gas heaters and hot water systems to be replaced with efficient electric alternatives when they reach end-of-life. All residential appliances, including cooking, should be included in the reforms. Further opportunities to support industrial gas users to electrify are outlined below.

Strong measures to reduce gas demand will enable the government to actively transition away from fossil fuels while maintaining energy reliability. As part of this, the government should **stop offering new exploration licences for onshore gas exploration**.

4. Support Victoria's manufacturing businesses to cut climate pollution, reduce operating costs and stay competitive

Victoria has more than 23,000 manufacturing businesses, and accounts for nearly one third of Australia's manufacturing output (Victorian Government Department of Jobs, Precincts and Regions 2022). Many of these are medium-sized businesses operating in the suburbs of Melbourne and regional centres – too big to qualify for programs targeted at small businesses, but not covered by the Safeguard Mechanism and associated funding streams. Just six of the state's manufacturing businesses are covered by the Safeguard Mechanism (Clean Energy Regulator 2024) - one of which, plastics maker Qenos, has recently closed due to high gas prices (Potter 2024). Many smaller manufacturers have also been hit hard by the rising cost of expensive and polluting gas in recent years. In 2022, Advance Bricks had to shut down its Stawell plant, costing 23 jobs, after it went from paying $6-8 a

gigajoule of gas to more than $37 (Aeria 2022).

For many of Victoria's manufacturers, opportunities to electrify gas use are already technically and commercially feasible. The Victorian Government should focus on targeted initiatives to enable these businesses to get off gas and switch to efficient electric appliances. As well as cutting costs and climate pollution, this will also support Victoria's manufacturers to stay competitive in both local and global markets, where consumers are increasingly seeking environmentally sustainable products. Measures could include:

- **Actively engage with large gas users:** Proactively engage with businesses that could benefit from electrifying their processes to link them with tools, resources, case studies and any applicable funding support to give them the confidence to make the switch.

- **Support businesses to access professional advice**: For example, the Victorian Government could deliver another round of the Large Energy User Electrification Support Program which supported businesses to undertake electrification feasibility assessments.

- **Expand the Victorian Energy Upgrades (VEU) Program:** As part of the strategic review of the VEU that is already underway, the Government should ensure that there are appropriate offerings of key technologies such as industrial heat pumps available through the VEU. In the food and beverage sector, one of Victoria's largest industrial gas users, adoption of industrial heat pumps could reduce Victoria's gas use by 36% in the next 10 years (IEEFA 2024b).

The Victorian Government could also leverage the work already undertaken through the Community Power Hubs Program, and the ongoing work of the Latrobe Valley Authority, to establish a Renewable Energy Industrial Precinct in the Latrobe Valley. The Latrobe Valley is home to more than 800 industrial facilities (Climateworks 2023). Establishing a REIP in the region would make the most of the existing skills base and renewable energy project pipeline, as well as supporting new jobs and skills as the remaining coal-fired power stations in the region retire.

5. Accelerate the move to shared and active transport

Transport is Victoria's second largest source of climate pollution after the stationary energy sector, accounting for around a quarter of the state's net emissions. The Victorian Government has taken important steps to decarbonise the transport sector in recent years, including through the Transport Sector Pledge, Zero Emissions Vehicle Roadmap, development of the Suburban Rail Loop and investment in an inner-city cycling network. However, there is more to be done.

Mode shift is the most efficient way to reduce transport pollution, while also improving traffic congestion, air quality, road safety and the cost of living. In Melbourne, half of all weekday trips are under 4.7 kilometres and most of these occur in a car (Climate Council 2023b). With better services and infrastructure, many more Victorians can choose shared and active transport for many more trips.

While investment in large projects is important, there are other options which can be implemented sooner and are more cost-effective. The Suburban Rail Loop will

not be operational until at least 2035 - and the northern section will not be complete until 2058. Investment is needed in options that will take cars off the road now.

Victoria's draft 30-year infrastructure strategy contains many sensible recommendations which should be implemented as a priority, including:

- running faster bus services, more often, in Victoria's largest cities
- building a new bus rapid transit network
- extending metropolitan trains and run more services in Melbourne's west
- running more bus and coach services in regional Victoria
- building safe cycling networks in Melbourne and regional cities
- rezoning locations near existing infrastructure and other reforms for more compact cities.

6. Protect and restore Victoria's landscapes

The Victorian Government's decision to end native forest logging from last year is an important step to protect biodiversity and cultural heritage, as well as prevent climate pollution - equivalent to taking 730,000 cars off the road every year (Australian National University 2023).

However, Victoria has the highest level of land clearing out of any Australian state or territory (Victorian Auditor-General's Office (VAGO) 2022). Not only does land clearing release carbon into the atmosphere, without proper regulation, it has devastating consequences for biodiversity. To address this, the Victorian Government should:

- **Strengthen regulations to reduce land clearing on private land:** Regulation should focus on conserving old growth forests, remnant forests and forests with a high biodiversity and carbon storage value.
- **Increase council resourcing to improve enforcement and early intervention of illegal land clearing:** Victoria's Auditor-General made several recommendations to enable councils to take action on illegal land clearing, in response to its findings that a significant proportion of land clearing is being undertaken illegally and that councils are not adequately resourced address this (VAGO 2022).

In addition, agriculture and waste together account for just over a fifth of Victoria's net emissions. We welcome the Victorian Government's commitment to ensure every household that receives waste and recycling services under existing networks will have access to FOGO, and its membership in the Zero Net Emissions Agriculture CRC (ZNE-Ag CRC) to accelerate research and development of low emissions agriculture solutions. To further reduce climate pollution from agriculture, the Victorian Government should:

- **Continue its investment in research, development and extension**, including through the ZNE-Ag CRC and measures to support uptake of technologies on farms such as the On-Farm Emissions Action Plan Pilot Program.

7. Adapt and build resilience to the impacts of climate change

Over the last two decades Victorians have experienced multiple catastrophic disasters including the deadly heatwaves in 2009 and 2014, the 2009 Black Saturday and 2019-20 Black Summer bushfires and the 2022 floods (State of Victoria 2009; State of Victoria 2014; Cameron et al. 2009; AIDR 2020; Parliament of Victoria 2024). Worse is on the way. Bushfires are projected to become more frequent and intense due to drier and warmer conditions in future (EMV 2023) While climate pollution is spurring long term declines in rainfall, extreme rainfall - one of the main contributors to floods - has been increasing (State of Victoria 2024). As a result, small floods are becoming less common and severe floods are increasing (State of Victoria 2024).

However, the impacts of the disasters are not evenly distributed. Some local government areas in Victoria are among the most impacted by disaster across Australia, based on receipt of Commonwealth funding for disaster recovery (ELCA 2024). It is likely that in future some communities will bear a disproportionate burden of climate-fuelled disasters. There are actions that the Victorian Government can take to better prepare local governments and communities for future disasters, and to support them through response and recovery:

- **Develop a state disaster mitigation plan:** Drawing upon the *Victoria Climate Science* and *Emergency Risks in Victoria* reports, the plan should show which local government areas are most exposed to disaster risks, and outline state government actions to reduce the impact of those risks on communities.
- **Assess local government disaster preparedness, response and recovery capacity and capability:** A majority of local governments are ill-equipped to respond to the challenges of more frequent and intense climate fuelled disasters - with those in regional and rural locations often faring the worst (Colvin 2024). There is an urgent need to assess the capacity and capability constraints councils are facing to better target further investment to those with the greatest need.
- **Examine the feasibility of developing a Victorian Household Resilience Program:** In response to the Inquiry into the 2022 flood event in Victoria, the government ruled out establishing a Household Resilience Program due to the complexity of determining the scope, reach, criteria and thresholds for such a program (Victorian Government 2025). However, the existence of similar programs in Queensland and New South Wales suggests that these complexities should not stand in the way of supporting those most in need (NSW Government 2025; Queensland Government 2024).

Conclusion

Victoria has the opportunity to lead Australia in climate action, demonstrating that a clean energy economy is both achievable and beneficial. By implementing ambitious policies across energy, transport, industry, agriculture and land, and to increase its resilience to the impacts of climate change, the Victorian Government can slash climate pollution while also improving social and economic outcomes.

We look forward to ongoing engagement and commend the Victorian Government for taking proactive steps toward a safer, healthier, and more sustainable future.

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