



# **HIA Submission**

## **Senate Inquiry into Climate Risk Assessments**

September 2025





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## Introduction

The Housing Industry Association (HIA) welcomes the opportunity to provide a submission to the Senate Inquiry into Climate Risk Assessments.

HIA is Australia's peak residential building industry association. HIA exists to service the businesses it represents, advocate for the best possible business environment for the building industry and to encourage a responsible and quality driven, affordable residential building and development industry.

As the voice of the residential building industry, HIA represents a membership of 60,000 across Australia. HIA members are involved in land development, detached home building, home renovations, low and medium-density housing, high-rise apartment buildings and building product manufacturing.

### About this Inquiry

As per the Terms of Reference for this Inquiry, the Senate referred the following matters to the Environment and Communications References Committee for inquiry and report by 20 November 2025:

- (a) the Government's secrecy and withholding of the Climate Risk Assessment (the assessment) from the Australian public since December 2024;
- (b) the research, consultation and preparation of the assessment by the Department of Climate Change, Energy, the Environment and Water;
- (c) the expected ongoing impacts upon the Australian community that are contained within the assessment;
- (d) the budgetary costs of both climate driven natural disasters and any government adaptation plans;
- (e) the Government's ongoing approach to transparency related to reducing emissions and adaptation to a world currently on track for 2.6 to 3.1 degrees of warming; and
- (f) any other related matters.

The Committee's Terms of Reference is very broad and HIA focusses in this submission on items (b), (c) and (f).



## Australia's diverse climate

Australia has a diverse climate, and our buildings can be potentially subjected to a range of different natural hazards such as cyclones, bushfires, flooding, earthquakes, hailstorms, and the like.

Ensuring that residential and commercial buildings are resilient to natural hazards is not a new concern and the planning and construction of safe and resilient housing in all forms across our cities requires an effective relationship between governments and the residential development and building industry.

This Inquiry presents an important opportunity to further consider what role, and what opportunities, there are for the Australian Government and organisations, such as HIA, can have in working together to help prepare for, respond to, and assist efforts in ongoing and predicted future natural disasters.

In this submission a number of recommendations are put forward in addressing the Terms of Reference for the Inquiry as it relates to housing and residential buildings.

These recommendations focus on practical measures Government and industry can take to support improving Australia's resilience, future mitigation against natural disasters and coordination activities on recovery and clean up and creating centralised and tailored information hubs to support recovery and preparedness.

These recommendations are as follows:

1. Governments should take a national approach, through leadership and consistent policies and actions at all levels.
2. That the establishment and work of the NEMA in a national leadership and coordination capacity remains, and their remit and activities are adequately funded in an ongoing capacity.
3. That NEMA continue to work and liaise with key industry bodies both post natural disaster events and in an ongoing capacity in looking at preparedness and mitigation.
4. Mitigating the impacts of climate change on our built environment and infrastructure should have a primary focus on upgrading performance of our 8-10 million existing homes to improve their resilience against hazards.
5. Evidence based decision making and policy settings is critical and requires greater investment and industry engagement.
6. Targeted funding and providing infrastructure that responds to the impacts of climate change is of critical importance in design of new cities and land subdivisions.
7. Broader mitigation strategies must be considered, the NCC and Australian Standards alone should not be the sole tool to achieve resilience.
8. Australia should consider an approach to mitigation, adaptation and resilience that focusses on applying a 'Hierarchy of Control' style model to this issue similar to WHS legislation that looks at a tiered, multi-faceted and holistic approach.
9. This should apply the principles by ranking hazard control measures from most to least effective, prioritising elimination, followed by substitution, engineering controls through planning and urban infrastructure provisions and followed by building codes and administrative controls, and finally, on site management and homeowner education.
10. A central repository of adaptation guidelines and single national risk rating tools should be developed to help homeowners and builders improve resilience and inform government and industry decision making.



## Background and policy settings

The issue of Australia's disaster resilience continues to emerge as a key issue for all levels of government. Ongoing natural disaster incidents arising from extreme weather conditions are leading governments to look not only at the preparedness, response and recovery but also mitigation actions to prevent future damage.

Many of these major events are followed by inquiries or post incident analysis which leads to recommendations for reforms, including most recently through the Natural Disasters Royal Commission, the Northern Australia Inquiry and a range of State and Territory Inquiries post the 2019/20 Black Summer Bushfires, and recent flooding affecting numerous parts of the country.

Presently, there is a broad range of resilience impacts being managed in Australia and for new housing this is addressed through planning and building laws.

While new land and housing can be seemingly well managed to address these events, the majority of Australia's existing housing stock already exists. These homes are built to past building code standards and located in areas that may today be considered not appropriate.

This points to the need for mitigation and recovery to be the more prominent topics for government attention, particularly for existing building stock.

### National approach to resilience

The Federal government's policies on resilience to extreme weather and natural disasters has continued to evolve over the last five years.

In October 2021, the National Climate Resilience and Adaptation Strategy 2021 – 2025, positioning Australia to better anticipate, manage and adapt to our changing climate (the Strategy) was released.

The Strategy built on the six principles of effective resilience and adaptation and developed three objectives and four connected domains.

The Strategy also identifies adaptation strategies for each state/territory, these are:

- Northern Territory Climate Change Response, Towards 2050
- Western Australian Climate Policy
- South Australian Government Climate Change Action Plan 2021 – 2025
- Victoria's Climate Change Strategy
- Tasmania's Climate Change Action Plan 2017 – 2021
- ACT Climate Strategy 2019 – 2025
- NSW Climate Change Policy Framework
- Pathways to a Climate Resilient Queensland – Queensland Climate Adaptation Strategy 2017 – 2030

The common theme in these initiatives are calls for climate change adaptation to respond, manage and reduce the impacts of natural disasters on both the natural environment and the built environment.

## **The need for a broad approach**

Through the *National Disaster Risk Reduction Framework*, it advocates for a comprehensive strategy which encompasses not only corrective risk management like retrofitting, reinforcing, remedial measures; but initiatives of equal importance such as compensatory risk management supporting financing and transfer, reactive risk management early warning systems, and effective response and recovery.

An independent review initiated from the Royal Commission into disaster resilience has seen the establishment of a National Emergency Management Ministers Meeting with the responsibility to perform policy and standard setting functions. This may include cross-portfolio issues, such as building, planning, land management. Coordination of responsibility and a clear agenda and opportunities for involvement is necessary.

## **Risk tools**

There is a role for market-based mechanisms to disclose risk, assisted or informed by that currently played by insurance which provides a market signal if risk is tolerable.

HIA are supportive of providing information to owners and the public to inform their risk. It would serve as a potentially simple means of communicating potential risk.

The Resilient Building Council has developed a rating scheme, with the assistance of NEMA, the Bushfire Resilience Rating in response to the 2020 Royal Commission into National Natural Disaster Arrangements, to help understand which actions measurably increase the resilience of individual homes.

*“It is the first scientific system to measure the bushfire resilience of homes, and has the potential to give insurers, banks and investors a framework for financing and rewarding bushfire resilience adaptations.”*

Such tools serve as an example of what is possible and are planned to be expanded to other hazards.

More analysis, broader stakeholder involvement and transparency could assist ensuring precautionary and inefficient approaches do not impede wider uptake and support innovative tools.

## **Data driven insights**

There is a role for data in identifying the vulnerability/opportunity of housing stock and target incentives to those at risk (owners or occupiers). Mandatory disclosure of existing building performance is being considered by states and territories, could augment other data existing data.

The use of AI and satellite imagery to estimate building footprints, heights and volumes, has been used for bushfire research for urban planning, infrastructure resilience and disaster preparedness.

## **Agency oversight**

Post the Black Summer Bushfire saw the creation of the National Bushfire Recovery Agency (NBRA). Since then, the agency has been recreated as the National Recovery and Resilience Agency (NRRA), and the scope of the NBRA was extended to disaster recovery and resilience activities more broadly.

Subsequently NRRRA and Emergency Management Australia, were consolidated to create a single, enduring, end-to-end agency known as the National Emergency Management Agency (NEMA) to better respond to emergencies, help communities recover and prepare Australia for future disasters.

That agency now has carriage of overseeing, coordinating and supporting recovery efforts after each natural disaster. HIA is broadly supportive of the continued work and role of the NEMA as well as the proactive part of their remit on resilience.

Post the bushfires the NEMA (then NBRA) established key stakeholder industry liaison committee to discuss recovery efforts and coordination activities, this committee meet on a regular basis in the immediate aftermath of the bushfires and has continued to meet on a semi regular basis over the past 18 months.

Post the most recent flooding the meeting returned to a more frequent basis. Aside from these meetings, NEMA has had a continued dialogue with key industry groups, and HIA has provided NEMA and the equivalent state government resilience agencies with a list of potential actions to assist in the rebuilding process.

Several have already been announced by governments in response to the bushfire, flood rebuild processes to help streamline rebuilding process and remove unnecessary red tape, and fees and charges for affected homeowners.

This forum and the continued consultation with key industry groups on recovery, coordination, mitigation and preparedness remains an important platform for industry and government engagement on disaster resilience.

## **Recommendations**

1. A single national risk rating tools should be developed to help homeowners and builders improve resilience and inform government and industry decision making.
2. Governments must take a national approach, through consistent policies, leadership and actions at all levels.
3. That NEMA continue to work and liaise with key industry bodies both post natural disaster events and in an ongoing capacity in looking at preparedness, mitigation, measures to streamline rebuilding processes for affected homes and on workforce capacity issues.
4. That the establishment and work of NEMA in a national leadership and coordination capacity remains, and their remit and activities are adequately funded in an ongoing capacity.
5. Evidence based decision making and policy settings is critical and requires greater investment and industry engagement.



## Planning, infrastructure, building codes and existing buildings

Building work in Australia is regulated through state and territory building legislation. The legislation calls up the National Construction Code (NCC) for the technical design and construction requirements for buildings and other structures.

The NCC is developed and maintained on behalf of states and territories by the Australian Building Codes Board (ABCB). The ABCB is a COAG body, and their work is overseen by Commonwealth and State and Territory Building Ministers.

The NCC is a uniform set of technical provisions for building work and provides the minimum necessary requirements for safety, health, amenity and sustainability in the design and construction of new buildings throughout Australia.

Whilst the NCC is a uniform set of technical provisions, within its scope, it has the ability to provide for variations in standards based on different geographic or climatic zones.

This allows for buildings that are 'mapped' in a specific area, such as buildings located in cyclonic areas, earthquake areas, bushfire prone areas, flood hazard areas, etc., to place additional design and construction requirements, beyond those that apply to a 'standard building.'

These additional requirements will seek to mitigate the risks posed by those natural hazards and the requirements are generally applied through Australian Standards called up in the NCC.

An important point to note is that the building policies apply to ensure the safety of the occupants of buildings and their ability to exit the building to a place of safety, as opposed to the building being able to completely withstand these events.

### **Australia's building codes and Standards are under constant review**

Australian Standards referenced in the NCC are developed through a technical committee approach that includes experts in specific fields. These experts are informed by research, international approaches and the learnings from past building performances where a natural hazard exists or an event has occurred.

These standards are reviewed on a regular basis to ensure they are adequate and remain contemporary. When natural hazards such as cyclones, bushfires, floods, etc. occur the adequacy of the building's resilience is monitored.

Where it has been found that a certain area or component of a building or design feature is deficient, the requirements will generally be upgraded.

Industry plays a key role in informing this and in the development of the technical requirements within our codes and standards to address the concerns. HIA participates on numerous committees and working groups in the development of these codes and standards.

Whilst our building codes and standards are always evolving, in the most part Australian new houses and buildings have a sound-track record in their ability to withstanding natural hazards where they occur.



Often Australia's regulations and policies inform other countries standards regarding building performance and resilience to natural hazards.

HIA does not believe however, that the current processes around updating the NCC and the relevant Australian Standards require any change to further facilitate responses to natural disasters.

The current processes can be shown to already cater for changes where required. Through this process any changes to building policies need to be evidence based and be informed by Regulation Impact Analysis in accordance with COAG principles.

### **Planning and zoning systems and urban infrastructure design must play a bigger role**

Research for the Australian Business Roundtable in 2017, contended land use planning is the state governments' strongest tool to mitigate natural disaster risk, but is yet to embrace its role fully. While building codes are at least generally subject to scrutiny, this is less common in planning where political pressure and affordability concerns dominate.

Incentives should be used to ensure land adjacent to populations are appropriately managed.

Mapping is underway in several jurisdictions to inform risk and ensure consistent standard and stocktakes risks, but methods differ. Mapping should occur under an agreed and consistent predicted future climate framework. This would allow risks to be mitigated at the appropriate level and ensure burdens do not fall unduly on individual buildings to be reduced after development when new maps or standards are developed.

This can complement planning for vegetation management, which has shown to be one of the main driving factors for risk from bushfire.

Australia should consider an approach to mitigation, adaptation and resilience that focusses on applying a 'Hierarchy of Control' style model, to this issue similar to WHS legislation that looks at a tiered, multi-faceted and holistic approach.

This should apply the principles by ranking hazard control measures from most to least effective, prioritising elimination, followed by substitution, engineering controls, administrative controls, and finally, on site management and homeowner education.

### **Upgrading existing buildings to make them more resilient to natural disasters**

While new land releases and housing can be seemingly well managed to address natural disasters, what about the majority of Australia's existing housing stock?

These homes are built to past building code standards, or well before building codes being in place, and located in areas that may today be considered inappropriate.

Moving forward, this will be the bigger challenge – how do we effectively and affordably mitigate the risks for the 11 million homes we already have?

HIA believes a greater focus is needed on government taking steps to mitigate the risk now and into the future. The hard consequence of this is that we expect to see more discussion centred on whether to rebuild or relocate once a disaster has occurred.

In 2011, around 100 homes in Grantham were relocated with support from local, state and federal government. This year the same is occurring following NSW and Queensland floods, with local, state and federal government supporting homeowners to relocate.

This approach is the right one to take, to assist affected homeowners move to a safer place, where it is found their homes will continue to be affected by extreme weather events.

HIA is supportive of governments voluntary 'buy back' programs for homeowners who have had their homes significantly impacted by natural disaster and where it is likely to be subjected to future natural disasters.

Further to this, a number of government agencies (federal and state) have started to look at potential upgrading of existing homes program to improve their performance and resilience and assist in mitigation against future natural hazards.

It is likely that any such program would be an opt in, apply for a grant for works type of arrangement, as opposed to setting of minimum standards that would need to meet.

There are also discussions about such a program, being coupled with insurance policies and discounts for homeowners that have undertaken specific mitigation measures.

From initial discussions with some of the agencies investigating these programs or looking to establish a pilot program, that they have been looking at highly bureaucratic processes for assessments, inspections and reports for determining what measures to implement, which could quickly and easily add significant costs to undertaking fairly simple mitigation measures.

As such, HIA's knowledge of simple, practical and effective measures can assist in designing an effective scheme and well placed to assist in designing such a scheme on determining practical measures that can be retrofitted into homes and on financial support packages for this work.

## **Recommendations**

1. Targeted funding and providing infrastructure that responds to the impacts of climate change is of critical importance in design of new cities and land sub-divisions.
2. Australia should consider an approach to mitigation, adaptation and resilience that focusses on applying a 'Hierarchy of Control' style model, to this issue similar to WHS legislation that looks at a tiered, multi-faceted and holistic approach.
3. This should apply the principles by ranking hazard control measures from most to least effective, prioritising elimination, followed by substitution, engineering controls, administrative controls, and finally, on site management and homeowner education.
4. Governments to fund a pilot program, in the first instance, for the upgrading and improving the resilience of existing buildings particular those in areas that have been impacted by past natural disasters or where modelling indicates they may be likely to be subject to future extreme weather events particular bushfires, cyclones and floods.
5. Governments to work with the housing industry on the design and implementation of this upgrading (mitigation) program to improve the performance of existing homes to natural hazards.



## **Adaptation guidelines and repair work post event**

### **Cost-effective retrofitting options for improving the resilience of Australia's existing housing stock**

Upgrades to housing can improve resilience to cyclones, bushfires, flooding and heat.

Sustainability Victoria has undertaken research investigating the relative benefits of different interventions for energy efficiency, a similar study would be informative in the resilience space.

What is obviously overlooked in most high level policy modelling is the diversity of starting conditions which more rigours analysis has shown to be fundamental to benefits and therefore justification to intervention.

Tailored solutions and incentives are therefore needed to encourage uptake. Break even tools and discounted finance could also assist.

Outside of standards and academic publications, little consistent and national advice is available on bushfire hazard in Australia. Owners/occupants, designers and builders all benefit from understanding the intent of bushfire responsive design and inform choices that might otherwise undermine it.

Authoritative advice has a place to manage risks where regulatory control is either inappropriate or cost prohibitive, such as the ongoing occupation of a building and maintaining clear space and vegetation and ensuring landscaping features and storage of combustible materials do not undermine the building controls.

The Australian Standards committee FP-020 have in development HB-208 Part 2 – a Consumer guide to the bushfire standard, along with Part 1 – a companion Handbook to using the Standard. These will prove invaluable for those seeking to do more, and those whose assets and lives depend on their choices long after a building is approved.

### **What can be done to improve awareness?**

HIA are currently developing an existing buildings guide. This will be a valuable resource for HIA members, builders and designers, but the broader industry and consumers and product manufacturers may also see value in its content.

The guide aims to be a valuable resource to assist consumers when embarking on renovations and additions, as a companion when planning and navigating compliance with new standards, and applying voluntarily higher standards. It will discuss both opportunities and obligations it can serve to promote consideration of the highest priority interventions for a building given its risk.

### **Central repository**

The last component which ties in the elements above, is education and industry leadership.

Over the last number of years there has been a proliferation of guides, resources, handbooks, etc., being developed by numerous different entities on rebuilding, current rules, mitigation measures, etc., creating confusion and uncertainty on which to use, which is better than the offer or what takes precedence.

There are benefits, in a more coordinated approach, to bring this together into a central repository as a 'single source of truth' for homeowners and builders which can be used to make homes more resilient to natural hazards, post incident clean up and rebuilds and repair work.

## **Repair work post natural disaster**

Recent natural disasters have occurred at a time where the building industry has been at one of, if not, their busiest periods. The repair work post natural disasters have placed further pressures on the industry to undertake the work and pulling from the same pool of contractors.

With the insurance (repair) work, HIA has heard examples where this work to say re-roof a home being 3-4 times higher paying work than for laying a roof on a new home. Naturally, contractors may look to prioritise this higher paying work.

From the bushfires and rebuilds resulting from the Black Summer bushfires, in addition to the above, the ability to get in a timely manner planning approvals, building certifier/surveyors approvals, bushfire assessments and approvals, etc., were significantly constrained.

It also resulted in business of usual non rebuild/replacement approvals, getting significantly impacted from timely assessments and pushed back in the queue with rebuild/replacement approvals prioritised.

Whilst not opposed to prioritising this work, governments and industry collectively, need to look at establishing a more strategic approach to a workforce that can be drafted into support rebuild/repair work.

This approach should look to ensuring that the work does not adversely impact on 'business as usual' work and overcome the situation of significant price fluctuations for labour and materials post natural disasters.

This is particularly challenging as often natural disasters will occur in remote or regional areas that already face significant workforce shortages issues in current market and from a longer term perspective.

## **Recommendations**

1. Governments in collaboration with industry should support the establishment of a central repository 'single source of truth' for relevant guidelines, tools, etc. for measures home owners and builders can use to make homes more resilient to natural hazards and post incident clean up and re-builds and repair work.
2. HIA is supportive of maintaining a central (federal) government coordination agency that is adequately resourced to focus on resilience and recovery post natural hazards.
3. Governments and industry to work collectively, to establish a strategic approach to workforce development and a mobile workforce that can be drafted into support rebuild and repair work that at the same time does not adversely impact on business as usual work particular in remote and regional areas.