



**Actuaries  
Institute.**

30 April 2026

Submitted via [Climate Change Authority Consultation Portal](#)

Dear Sir/Madam

## [Response to the Climate Change Authority's Consultation on developing an Evidence Platform](#)

The Actuaries Institute ('the Institute') welcomes the opportunity to provide feedback on the Climate Change Authority's ('CCA') consultation on the development of an Evidence Platform.

The Institute is the peak professional body for actuaries in Australia. Our members work in a wide range of fields including insurance, superannuation, investments and retirement incomes, banking, enterprise risk management, data science and AI, climate change impacts and government services. The Institute has a longstanding commitment to contribute to public policy discussion where our members have relevant expertise. The comments made in this submission are guided by the Institute's ['Public Policy Principles'](#) that any policy measures or changes should promote public wellbeing, consider potential impacts on equity, be evidenced-based and support effectively regulated systems.

This submission reflects the need for increased focus on investment in climate adaptation and resilience, and is aligned with the Institute's [Climate Change Public Policy Statement](#). In summary, this supports an ambitious, orderly and equitable transition to net zero, with co-ordinated, timely investment in adaptation, resilience and nature.

The Institute supports the overarching ambition of the Evidence Platform: the intent is well-founded, with an appropriate emphasis on outcomes and the pace of progress, rather than tracking completion of actions alone. The proposed alignment of the Platform with existing national frameworks, such as the National Climate Risk Assessment (NCRA), National Adaptation Plan (NAP) and Net Zero Plan, is highly appropriate, as it promotes consistency and minimises duplication which in turn enhances the impact and effectiveness of the Platform.

The five design principles provide a strong foundation. We recommend that an additional design principle be included focussed on decision usefulness, particularly on how the Platform supports the identification, prioritisation and calibration of recommendations. By way of example and building on this:

- The Platform will publish benchmarks for each metric to measure progress against key targets. We suggest that this be extended to include hindsight comparisons of actual progress against benchmark expectations for each reporting period, alongside clear signalling to guide responses where metrics deteriorate. This could take the form of a calibrated traffic light framework (e.g. on-track, at risk, off-track), supported by an intervention ladder (e.g. monitor, adjust, intervene, escalate).

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- The Platform could be further strengthened by indicating the likelihood of achieving key targets (such as 2035 goals) under current policy settings.

The Institute is highly supportive of the proposed annual review and improvement cycle, noting that the most appropriate set of available metrics is likely to evolve rapidly over the next 5-10 years.

The Institute makes the following suggestions in relation to the **adaptation and resilience** domain:

Outcome	Metrics for future years' development	Suggestion
AR4: Australia's economy, trade and finance systems continue to prosper despite increasing physical climate risks.	<b>CCA Metric:</b> Proportion of households and businesses with adequate insurance	<p>We suggest that greater clarity is required on how "adequate insurance" is defined, particularly for businesses which have a wide range of insurance needs and risk profiles.</p> <p>We also note that non- and underinsurance are key considerations in assessing whether households and businesses have adequate insurance, which is proposed as a separate metric under outcome AR7. As duplicating indicators across outcomes is not good practice, we recommend consolidating these under a single outcome.</p> <p>The Issues Paper identifies the Insurance Council of Australia as a potential data source for adequate insurance, and the Household, Income and Labour Dynamics in Australia survey as a potential data source for measuring non- and underinsurance. For home insurance, we suggest that consideration also be given to leveraging the National Insurance Dataset being developed by the Australian Bureau of Statistics (ABS) in collaboration with participating insurers via the Hazard Insurance Partnership (HIP). This dataset will be based on actual policies and linked to the Person Level Integrated Data Asset (PLIDA) which will enable deeper insights on non- and underinsurance.</p> <p>We note that while the proposed insurance metrics under AR4 and AR7 are outcomes-focused, they may not fully capture affordability challenges which are a key (but not the only) driver of under and non-insurance. The Institute recommends the CCA also consider affordability metrics. We note that the Actuaries Institute work on <a href="#">home insurance affordability</a>, which included an affordability metric, was adopted by the Australian Prudential Regulatory Authority in the recent Insurance <a href="#">Climate Vulnerability Assessment</a>.</p>
AR7: Settlements, buildings and infrastructure are resilient to the impacts of climate change	<b>CCA Metric:</b> Proportion of uninsured and underinsured households	See above suggestion for consolidation of insurance-related metrics.
	<b>New proposed metric:</b> Proportion of new homes built in high risk hazard areas	<p>The CCA's report <a href="#">Home Safe: National Leadership in Adapting to a Changing Climate</a> notes that "<i>outdated planning and development practices are failing to adequately consider physical climate risks...housing developments are also gradually moving into more flood and bushfire-prone areas</i>".</p> <p>There is currently no proposed metric in the Evidence Platform that monitors land-use planning outcomes or exposure arising from new developments. We recommend that inclusion of this metric can track the extent to which planning decisions may be increasing long-term exposure to climate risks. This is consistent with the Institute's recent submission made on the <a href="#">NSW Climate Change and Natural Hazards State Environmental Planning Policy</a>, which recommends the adoption of mandatory "no new residential exposures in high risk zones" provisions.</p>

Outcome	Metrics for future years' development	Suggestion
		<p>We also note the role of building codes in supporting housing resilience to future climate impacts, which we discuss in our submission made to Treasury's consultation on <a href="#">Streamlining and Modernising the National Construction Code</a>.</p>
	<p><b>Additional metric that can be included over time:</b> Resilience of Australian households</p>	<p>The Productivity Commission and the HIP have both called for the development of a national resilience ratings system, such as the framework developed by the <a href="#">Resilient Buildings Council</a> (currently a 1–5 star rating at a peril-specific level). As households begin to receive certified ratings under this system, we recommend monitoring of the following metrics:</p> <ul style="list-style-type: none"> <li>• Proportion of households that have obtained a resilience rating for their home.</li> <li>• Average resilience rating across Australia for homes with a rating.</li> </ul> <p>We note that uptake of the RBC resilience rating is still at an early stage, and to date only a small proportion of households in Australia have obtained a rating. We suggest that this metric be considered for inclusion in the Platform in future once take-up is more widespread.</p> <p>These metrics would provide meaningful, actionable information to households on the physical safety and resilience of their dwellings, and demonstrate how adaptation measures are translating into tangible outcomes at the household level. A number of major insurers have incorporated resilience ratings to inform risk-based premium setting for home insurance.</p> <p>Similar metrics and associated targets for resilience ratings could also be embedded within the National Adaptation Plan, with monitoring undertaken at local government, state and federal levels.</p>

For relevant outcomes in the adaptation and resilience domain (including the AR4 and AR7 insurance and resilience metrics discussed above), we recommend that metrics relating to physical climate risk should be disclosed at an appropriate level of granularity where possible and defined in relation to its actual exposure to risk, to reflect the significant differences in hazards across Australia. For example, postcode- or LGA-level metrics are likely to be more informative than state-wide or national aggregates.

The Institute makes the following suggestion in relation to the **critical enablers** domain:

Outcome	Metrics for future years' development	Suggestion
Finance & investment	<p><b>New proposed metric:</b> Volume of private sector securities being classified as 'adaptation' under a future ASFI Taxonomy</p>	<p>In our response to the Australian Sustainable Finance Institute consultation on <a href="#">Australian Sustainable Finance Taxonomy</a> we noted the importance of private sector investments in supporting resilience measures for homeowners.</p> <p>We note that such a classification and taxonomy does not yet exist, however the Actuaries Institute strongly supports the development and subsequent tracking of this proposed metric.</p> <p>The Institute provided further discussion about why the ASFI taxonomy should be extended to include clear definitions of "adaptation" to support private investment in adaptation in</p>

		the recently published report on <a href="#">Mobilising Investment For Climate Adaptation</a> (refer recommendation 3.1).
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The Institute would be pleased to discuss this submission. If you would like to do so, please contact us on (02) 9239 6100 or [public\\_policy@actuaries.asn.au](mailto:public_policy@actuaries.asn.au).

Yours sincerely

(Signed) Elayne Grace

CEO