

7 May 2026

Evidence Platform team
Climate Change Authority

Via email: consultation@cca.gov.au

Dear Evidence Platform team

RE: 2026 Evidence Platform Issues Paper

The Green Building Council of Australia (GBCA) welcomes the opportunity to provide input to the consultation regarding the 2026 Evidence Platform Issues Paper (the Issues Paper). We commend the Climate Change Authority's (the Authority) ongoing commitment to tracking progress against medium and long-term emissions and resilience goals.

GBCA's purpose is to lead the sustainable transformation of the built environment. We do this primarily through our core functions:

- We advocate policies and programs that support our vision and purpose.
- We rate the sustainability of buildings, fitouts and communities through Australia's largest national, voluntary, holistic rating system – Green Star.
- We educate industry, government practitioners and decision-makers, and promote green building programs, technologies, design practices and operations.
- We collaborate with our members and other stakeholders to achieve our mission and strategic objectives.

GBCA supports the development of the Evidence Platform (the Platform). We agree it must be underpinned by metrics and indicators that can provide consistent, accessible and verifiable information to track progress and support the national conversation on appropriate policies and action to achieve our goals. GBCA agrees that the proposed design of the Platform and proposed metrics and benchmarks provide a reasonable starting point. We welcome the opportunity to provide input, both in this submission and as the Platform is further developed. Our initial suggestions include:

- Consider including metrics relating to the phase down of refrigerants
- Support for further expansion of the NABERS and NatHERS rating tools will lead to metrics for embodied carbon
- NABERS and NatHERS are identified as proposed metrics in the Platform but development of NABERS as a metric could be accelerated (currently scheduled for development in 2027) and NatHERS for existing homes could also become a useful metric in time
- Establishing more incentives for retrofitting existing homes and buildings could also support further metrics
- Metrics for circularity outcomes should be considered as part of the Green Growth domain
- Sustainable finance and climate-related financial disclosure on property asset portfolios continues to grow in Australia, creating opportunities to develop metrics.

GBCA makes the following comments in response to selected elements of the proposed design of the Platform outlined in the Issues Paper:

1. Questions relating to the overarching design of the Platform:

a. Will the proposed design of the Platform provide useful insights on Australia's transition?

GBCA commends the Authority on the proposed design of the Platform. We support the principles guiding the development of the Platform and note the importance of aligning the central pillars (or 'domains') of the Platform, and its proposed outcomes, with Australia's goals for reducing emissions, improving resilience and seizing the opportunities of a transition to a net zero economy.

2. Questions relating to the domains of the platform:

Emissions Reduction domain

a. Are the proposed metrics and benchmarks a reasonable starting point?

GBCA agrees that the proposed metrics and benchmarks listed for the Emissions Reduction domain represent a reasonable starting point. We note that identifying and developing metrics for the built environment should be considered in alignment with key policy documents such as the Updated Trajectory for Low Energy Buildings and the Trajectory for Low Energy Buildings Implementation Plan 2026-27.

b. Is the proposed sequencing of outcomes and metrics reasonable? For any outcomes or metrics not discussed in Part 3 of the paper, what data sources are available and regularly updated, that the Authority could use to measure these in future years?

c. Is there anything else about indicators of early progress that the Authority might consider?

GBCA supports the metrics proposed for *ER8: Built environment sector emissions fall in line with Australia's NDC*:

- Number of gas disconnections
- Heat pump imports.

GBCA suggests that as well as measuring the number of gas disconnections, it would also be useful to measure the number of new gas connections compared to new buildings approved. The Australian Energy Regulator could provide the gas connection information while the Australian Bureau of Statistics can furnish statistics on building approvals with building type (Functional Classification of Buildings) and gross floor area approved. While this would not provide a perfect count, it would provide an indication of the trend for gas connections in new buildings against a baseline year.

Heat pump imports will be a positive leading indicator, though we note that it may be difficult to measure impact given that some will be used for new builds, while some will replace existing equipment and there will be no way to measure this reliably if this metric is considered in isolation.

Other useful sources of data may include the Australian Government's Commercial Building Baseline Study and Residential Baseline Study.

Refrigerants

The built environment sector includes emissions from sources with a high global warming potential, such as hydrofluorocarbons (HFCs) used in refrigeration, air conditioning and some hot water systems. A global

phase-down of HFC production and imports was agreed under the Montreal Protocol on Substances that Deplete the Ozone Layer in 2016.^{1 2}

Metrics could include:

- The licenses for imports of bulk HFCs³
- Similarly to the heat pump imports metric proposed for ER8, import numbers of low-impact refrigerant systems unaffected by phase-downs and PFAS pollution could be captured.

Existing buildings must also phase down use of HFCs. This may be more difficult to track/develop a useful metric, but it may be possible to track via trusted product stewardship programs. GBCA welcomes the opportunity to provide further consultation regarding refrigerants. Please see GBCA's discussion paper, [Freeze frame: Refrigerants as long-term building infrastructure](#).

Embodied carbon

Ignoring the upfront carbon of our homes and buildings threatens Australia's net zero target by 2050. A single metric, or even a simple set of metrics, to track embodied carbon in the built environment is not currently widely adopted, but with greater commitment to, and funding for, existing rating tools this could change quickly.

The NABERS Embodied Carbon rating tool is now available and will provide valuable data as uptake grows in the commercial buildings sector. A guidance note for voluntary reporting of embodied carbon in new buildings is being developed by the Australian Building Codes Board, signalling the potential for a future move to reporting in the NCC.

The residential sector poses an even greater challenge. GBCA's report, [Our homes weigh a tonne](#), found that assuming the built environment continues to grow at the same pace, between now and 2050 we will build around 2.8 million new homes and almost 2 million new apartments. And if we assume the upfront carbon of our homes will not change, the construction of new homes could use between 7 to 11% of Australia's total carbon budget between now and 2050. Before a single appliance is switched on, the materials and construction of a typical Australian single family, detached house (Class 1a under the National Construction Code) already lock in more carbon than the home will ever emit through daily operation.

The Trajectory for Low Energy Buildings Implementation Plan 2026-27⁴ commits to investigating options for measuring carbon in residential buildings, to support voluntary action. GBCA is calling for funding for the NatHERS embodied carbon module to include a low-cost tool to calculate upfront carbon of homes at the design stage and make it easy to disclose upfront carbon in the NatHERS certificate. The information to calculate embodied carbon is already mostly entered as part of the NatHERS assessment. A builder already adds type of materials, and the software can calculate material amounts based on some simple extrapolation of information. By investing in NatHERS we can have upfront carbon disclosure with minimal cost, grow the available data to inform benchmarks for upfront carbon reduction, and provide a useful metric for the Platform.

¹ Australian Government. 2025. Built environment sector plan. <https://treasury.gov.au/sites/default/files/2025-09/p2025-698821.pdf>

² Australian Government. 2025. Trajectory for Low Energy Buildings Implementation Plan 2026-27. [The Trajectory for Low Energy Buildings Implementation Plan 2026-2027](#)

³ Since 1 January 2018, importers are required to hold licences for all imports of bulk HFCs. Bulk imports of HFCs are capped at around 2 Mt CO₂-e from 2036.

⁴ Australian Government. 2025. Trajectory for Low Energy Buildings Implementation Plan 2026-27. [The Trajectory for Low Energy Buildings Implementation Plan 2026-2027](#)

Adaptation and Resilience domain

a. Are the proposed metrics and benchmarks a reasonable starting point?

GBCA agrees that the proposed metrics and benchmarks listed for the Adaptation and Resilience domain represent a reasonable starting point.

b. Is the proposed sequencing of outcomes and metrics reasonable? For any outcomes or metrics not discussed in Part 3 of the paper, what data sources are available and regularly updated, that the Authority could use to measure these in future years?

c. Is there anything else about indicators of early progress that the Authority might consider?

Specifically, GBCA provides comment on the following metric proposed for AR7: *Settlements, buildings and infrastructure are resilient to the impacts of climate change*:

- Average NatHERS rating of Australian homes; Average NABERS rating of commercial buildings.

We note the following:

- This metric is proposed for development from 2027 onwards. However, the average NABERS rating of commercial buildings (together with energy and emissions saved) is already available for buildings that must participate in the Commercial Building Disclosure (CBD) program.
- GBCA suggests that this metric could be split – average NatHERS rating of Australian homes and average NABERS rating of commercial buildings – with the NABERS metric ready for immediate reporting.
- We note that while mandatory commercial building disclosure still only impacts a relatively small portion of the total commercial building sector (office buildings over 1000m²), this continues to grow and should not hold back reporting with this metric.
- The CBD Program Roadmap, released in 2025, outlines a plan and timeline for expanding mandatory disclosure to more commercial building types. GBCA advocates for expansion of the program (and appropriate funding to do this) to be achieved in a timely manner.
- GBCA suggests that behind the headline metric of ‘average NatHERS rating of Australian homes’ it will be important to include:
 - Total new homes rated with NatHERS
 - Total homes rated with NatHERS for existing homes
 - Average improvement in ratings for homes that are recertified with NatHERS for existing homes.

GBCA commends the work of DCCEEW in developing the NatHERS for existing homes rating tool and NSW DCCEEW which is leading a suite of pilots to test aspects of the rating tool’s implementation (first voluntarily with a view to move to mandatory disclosure). GBCA has long called for a single, national rating tool for home energy performance to empower homeowners, buyers and tenants to make more informed choices about the home they choose to buy, live in or invest in.⁵ National uptake of NatHERS for existing

⁵ GBCA and Property Council of Australia. 2023. Every Building Counts. <https://everybuildingcounts.com.au/wp-content/uploads/sites/37/2023/04/Every-Building-Counts-2023-Edition.pdf> (Recommendation 7.2).

homes will also provide a powerful source of data for tracking progress against climate, resilience, and well-being metrics.

Green Growth domain

GBCA notes that the Authority continues to develop the outcomes and metrics for the Green Growth domain.

Circular economy

We suggest that circular economy outcomes are considered alongside those being developed for Australia's green iron industry, foreign direct investment in decarbonisation aligned activities, and spending under the Future Made in Australia plan.

The Australian Government has committed to doubling Australia's circularity rate by 2035. Metrics are needed to help measure progress against this target so it would be useful to consider any relevant efforts underway and/or planned by government as part of the development of the Platform.

Critical Enablers domain

Social equity & acceptance

GBCA supports the metrics proposed for *SE1: Australians have equitable opportunities to adopt, and benefit from, decarbonisation technologies*.

- Uptake rates of energy decarbonisation technologies for rental and owner-occupied properties
- Average energy costs and affordability per person or socioeconomic strata, relative to the current fuel mix (under development).

We note that there may be useful correlations between data for the first SE1 metric and the metrics proposed under ER8:

- Number of gas disconnections
- Heat pump imports.

As well as for some of the metrics proposed under AR7, such as:

- Proportion of people able to keep their home at a comfortable temperature on hot days
- Average NatHERS rating of Australian homes
- Proportion of homes with insulation features (ceiling insulation, floor insulation, double/triple glazed windows) split by either income level, demographic and/or geographic region
- Proportion of homes with air conditioning split by either income level, demographic and/or geographic region.

GBCA notes that while some incentives exist to encourage uptake of energy decarbonisation for households (e.g. Household Energy Upgrade Fund), these are limited and focused on owner-occupiers. Real progress in this area will require introduction of a range of incentives that can support decarbonisation decision-making and actions for a range of different household situations at speed and scale – prioritising low-income households and including rental properties. Useful metrics could be developed based on uptake of these incentives.

Finance & investment

GBCA acknowledges that public funding is essential to addressing the challenges and opportunities of climate change, but the scale of investment needed means that private finance will also be critical.

In Australia and around the world, property assets are increasingly leveraged to access a range of sustainable finance instruments. Climate disclosure reporting on Australian property portfolios is well-

established and growing, underpinned by independent rating tools such as Green Star and NABERS. Australian investment funds regularly top international sustainability rankings such as GRESB (Global Real Estate Sustainability Benchmark)⁶. Australia's growing sustainable finance market and climate-related financial disclosure practices (mandatory and voluntary) provides opportunities for exploring suitable metrics.

GBCA has led and participated in important work to identify the opportunities for sustainable investment in the built environment both in Australia and internationally. This includes:

- Providing input to the development of Australia's Sustainable Finance Taxonomy – GBCA's rating tools, Green Star Buildings and Green Star Performance, are recognised as proxies within the taxonomy.
- [Unlocking the value: A practical guide for sustainable finance in the Australian real estate sector](#) – released by GBCA and Australian Sustainable Finance Institute, 2023.
- [Financing transformation: A guide to green building for green bonds and green loans](#) – released by GBCA, Alliance HQE (Green Building Council of France), BRE (Building Research Establishment UK), Singapore Green Building Council, US Green Building Council, 2024.

Our work in this area continues and we welcome the opportunity to work with the Authority to further explore how finance and investment in the built environment can deliver emissions reductions and suitable metrics to demonstrate progress.

Policy and governance

GBCA notes that the Authority will continue to develop outcomes and metrics for policy and governance. We look forward to the opportunity to provide input during further consultation.

To arrange further discussion, or for additional clarification of the points made above, please do not hesitate to contact Katy Dean, Senior Policy Adviser, via email at katy.dean@gbca.org.au.

Yours sincerely



Davina Rooney
Chief Executive
Green Building Council of Australia

⁶ GRESB. 2025. Regional scores breakdown by consecutive reporting year (see Oceania).
<https://www.gresb.com/2025-real-estate-assessment-results/#regional-scores-breakdown>