

27 February 2026

National Construction Code Modernisation
Housing Supply, Productivity and Engagement Division
The Treasury

Via online portal: <https://consult.treasury.gov.au/c2025-722616/consultation?page=1>

Dear National Construction Code Modernisation consultation team

RE: Streamlining and modernising the National Construction Code

The Green Building Council of Australia (GBCA) welcomes the opportunity to provide input to the review of the National Construction Code (NCC).

GBCA is a longstanding and constructive participant in successive reviews and updates to the NCC, contributing technical expertise and policy insight through formal submissions and consultation processes. GBCA consistently supports evidence-based reforms that improve building performance outcomes, including energy efficiency, water management and occupant health and safety, while also advocating for clarity, coherence and usability of the NCC for industry. GBCA works closely with the Australian Building Codes Board (ABCB), governments and industry stakeholders to support an NCC that evolves in a way that provides regulatory certainty, encourages innovation and enables the delivery of better buildings aligned with Australia's long-term economic, environmental and social 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 Treasury's objectives to modernise the NCC as a critical component of improving regulatory efficiency, system resilience and productivity and long-term economic performance.

Key reform priorities include:

- **strengthening governance arrangements while ensuring continuity, stability and the ongoing progression of the next edition of the NCC in 2029** – GBCA is a strong supporter of the ABCB. We believe that it has been a remarkably effective organisation, especially given a range of significant changes in the governance and operating environment since the last substantive review of the Inter-Governmental Agreement (IGA) in 2020. GBCA considers current ABCB funding levels are insufficient to meet current and future expectations. ***Appropriate funding to address a range of matters outlined in this submission should be committed to ABCB without delay.***

- **improving national consistency as it is essential to reducing unnecessary regulatory burden, minimising compliance complexity and enhancing market efficiency** – Governance arrangements should reinforce the NCC’s role as a national productivity reform and foundational national regulatory infrastructure by supporting consistent adoption and implementation across jurisdictions. This requires stronger intergovernmental commitment to the agreed governance framework. Ministers should continue to lead strategic direction and agree nationally significant regulatory outcomes. Ministers should be supported to make credible and well-informed decisions through access to independent, evidence-based advice that is insulated from short-term political or jurisdictional pressures.

The ABCB should be appropriately resourced and structured to undertake the vast majority of technical provision development and analysis involved in updates to the NCC.

As a longer-term process, GBCA recommends triggering a proper, comprehensive governance review of the ABCB to ensure that governance arrangements remain aligned with the scale, complexity and national importance of the NCC and Australian building regulations. ***We emphasise that any such review should not impact the delivery of NCC 2029.***

- **maintaining a predictable and transparent NCC update cadence, which is fundamental to supporting investment certainty and orderly industry adaptation** – GBCA, together with many in industry, supports retaining a regular update cycle, with flexibility to address critical issues where needed.

GBCA urges a renewed commitment from all Building Ministers that the current pause applied to NCC 2028 until 2029 will not be extended.

- **reducing structural complexity and improving regulatory clarity to deliver significant productivity and compliance benefits across the construction sector** - GBCA considers that introducing changes to the NCC in future will be most successful when stakeholders have a clear understanding of key changes that can be expected over time. GBCA supports a minimum standards framework for the NCC, while recognising it can also play a role in communicating pathways that encourage the voluntary uptake of best practice. GBCA supports careful review and reforms to the NCC that prioritise structural simplification, clearer drafting, expanded diagrams and more intuitive, user-centred formats.
- **modernising the regulatory impact analysis to reflect whole-of-life affordability considerations in order to strengthen policy decision-making and better account for long-term household, community and economic outcomes in a changing climate** – While a regulatory impact analysis process is already in place, GBCA agrees that this process could be strengthened to be more effective and robust. This could include a consultation process to agree on and publish key parameters ahead of the regulatory impact analysis process getting underway.
- **aligning the NCC with climate resilience and energy and emissions policy objectives to support occupant health and safety, reduce long-term risk exposure and enhance the durability and performance of Australia’s built environment** – GBCA notes the June 2024 Building Ministers’ Meeting Communiqué, in which Ministers agreed to elevate climate resilience as a specific objective of the ABCB and directed ABCB to introduce voluntary embodied carbon reporting pathways, alongside investigations into future minimum standards. GBCA strongly supports the investment in these areas of focus. Resilience outcomes will be most effectively achieved when embedded within nationally consistent minimum standards rather than optional or fragmented requirements, and developing a clear pathway to reducing embodied emissions will strengthen the alignment between the NCC and Australia’s broader transition towards net zero emissions.

GBCA emphasises that it is critical that the ABCB is appropriately resourced to progress work on resilience and embodied carbon immediately, so that well-considered and analysed options are ready for inclusion as part of the NCC 2029 consultation.

In the following submission, GBCA provides further detail on these key reform priorities, together with comments regarding questions posed in the consultation discussion paper.

GBCA welcomes continued engagement with The Treasury, the ABCB and jurisdictions to support effective and coordinated reform. We welcome the opportunity to provide further detail on any points outlined above. To arrange further discussion and/or consultation, please do not hesitate to contact Katy Dean, Senior Policy Adviser, via email at katy.dean@gbca.org.au.

Yours sincerely

A handwritten signature in cursive script that reads "D. Rooney".

Davina Rooney
Chief Executive
Green Building Council of Australia

GBCA submission re streamlining and modernising the National Construction Code

In the following submission, GBCA provides further detail on the key reform priorities noted in the covering letter, together with comments regarding the following questions posed in the consultation discussion paper:

1. Does the current ABCB governance model work? Why or why not? What should change, if anything?

Addressing challenges for the ABCB

GBCA is a strong supporter of the ABCB. Over an extended period, the ABCB has made a substantial and enduring contribution to the effective development, maintenance and administration of the NCC as a nationally consistent, performance-based regulatory framework. It has demonstrated strong stewardship in balancing critical objectives relating to safety, health, amenity, accessibility and sustainability, while progressively modernising the NCC to reflect evolving evidence, community expectations and industry capability.

We believe that it has been a remarkably effective organisation, especially given a range of significant changes in the governance and operating environment since the last substantive review of the IGA in 2020.

As well as the ABCB's recent transition to sit within The Treasury's portfolio other changes include:

- The dissolution of the Council of Australian Governments (COAG) and renaming of the Building Ministers' Forum (BMF) to Building Ministers' Meeting (BMM) which is not captured in the IGA.
- An apparently evolving role for the BMM, which has not been clearly captured in the IGA.
- A growing set of responsibilities and industry and community expectations. For example, while the BMM has directed that climate resilience should be explicitly included in the ABCB's objectives, this has not been reflected in the IGA (clause 6.1.a.C). Current regulatory impact analysis frameworks also do not adequately recognise the cost of climate change inaction.
- No corresponding increase in funding to meet changing expectations. Indeed, ABCB has experienced decreasing certainty around future funding. For example, the removal of NCC sales revenue without a commensurate funding replacement, while the methodology used to apportion jurisdictional contributions requires review and updating.

GBCA considers current ABCB funding levels are insufficient to meet current and future expectations, particularly around Building Confidence Report¹ implementation, compliance, and technical capability. Appropriate funding to address these matters, and others outlined in this submission, should be committed without delay.

Noting the challenges around governance, funding and role (perceived or otherwise) of the ABCB, GBCA supports consideration of a planned, well-funded future review to explore alternative governance models – for example, a commission-style structure – that strengthen independence, clarify accountability, and enable nationally consistent oversight of both code development and compliance outcomes. Any future reform should be accompanied by clear statutory objectives and adequate resourcing. Regardless of any future reform, greater clarity of governance structure and responsibilities, and the pathways between roles/reporting lines is needed.

¹ https://treasury.gov.au/sites/default/files/2025-07/building_ministers_forum_expert_assessment_-_building_confidence.pdf

While governance reform is both necessary and timely, it is essential that any governance review process for the ABCB occurs **in parallel with the continued operation and progression of the 2029 edition of the NCC.**

The NCC development process cannot be delayed or destabilised while governance reforms are considered. Continuity, predictability and regulatory stability must remain central principles throughout the reform processes. There is no time to lose in preparing for the next NCC update and the need for well-resourced provision development and analysis has never been greater.

Addressing broader issues of governance and implementation

Beyond the governance issues noted above, one of the biggest challenges for the effectiveness of the NCC is its implementation by jurisdictions.

While the NCC is developed as a nationally consistent instrument, its adoption, amendment and enforcement ultimately rest with individual jurisdictions, which retain the ability to introduce variations, concessions and transitional arrangements. This structural reality can undermine the objective of national consistency, leading to increased complexity for industry, reduced regulatory certainty and higher compliance costs. As a result, divergence persists despite the ABCB's efforts to promote harmonisation, highlighting the importance of complementary intergovernmental mechanisms and ministerial commitment to support consistent implementation alongside any future streamlining and modernisation of the NCC.

Since the early 1990s, a nationally consistent NCC has been a cornerstone of Australia's productivity agenda—reducing duplication, lowering compliance costs, and providing industry with the certainty it needs to invest and innovate. This relies on a robust process of development and analysis of provisions by ABCB, followed by the commitment of Building Ministers to the timely implementation of the updated version of the NCC across Australia.

While carefully considered jurisdictional variations are warranted, GBCA supports their harmonisation wherever possible. Increasing fragmentation of adoption and implementation of updated editions of the NCC across jurisdictions is having real implications for cost and complexity, inconsistent outcomes regulatory inefficiency and declining confidence in the building regulatory framework.

2. How effective is the current model at facilitating adequate stakeholder engagement? How could it be improved?

As an industry association accustomed to analysing technical information and providing formal submissions, GBCA can navigate the current model of stakeholder engagement. However, we note that for others in industry, this may be a complex and time-consuming process.

It is unclear whether the purpose of engagement is purely intended to inform technical development, or whether it also aims to build industry capability and/or improve compliance. By the measure of informing technical development, we note that stakeholder engagement to date has been undertaken effectively by the ABCB team and while improvements will be welcomed by industry, any program of reform must also be funded appropriately.

Any stakeholder engagement processes should be a mechanism for better outcomes and GBCA considers that stakeholder engagement must be purpose-driven, outcome-focused and clearly linked to decision-making. Engagement should support technical quality, workforce capability and consistent implementation, rather than simply meeting procedural requirements.

GBCA agrees that AI could be a useful tool for designing the engagement process, communicating proposed changes to stakeholders and analysing results. A process where proposed provisions are explained in plain language and feedback is invited via a simplified/interactive process may capture a wider range of industry voices and experience.

3. What is the best governance model to ensure independent and quality advice is provided to Ministers as the final decision makers of the NCC and related matters?

Governance arrangements should reinforce the NCC's role as a national productivity reform and foundational national regulatory infrastructure by supporting consistent adoption and implementation across jurisdictions. This requires stronger intergovernmental commitment to the agreed governance framework, rather than fragmented decision-making that undermines confidence in the system.

As per the IGA, Ministers should continue to lead strategic direction and agree nationally significant regulatory outcomes. Ministers should be supported to make credible and well-informed decisions through access to independent, evidence-based advice that is insulated from short-term political or jurisdictional pressures.

GBCA supports governance arrangements that prioritise independent, expert advice, supported by transparent appointment processes and sufficient resourcing to attract and retain specialist capability. The ABCB should be appropriately resourced and structured to undertake the vast majority of technical provision development and analysis involved in updates to the NCC without requiring Ministerial approval.

As a longer-term process, GBCA recommends triggering a proper, comprehensive governance review of the ABCB to ensure that governance arrangements remain aligned with the scale, complexity and national importance of the NCC and Australian building regulations. **We note that this review should not impact the delivery of NCC 2029.**

Such a review should engage governance, regulatory and institutional experts, examine existing governance and funding models, and consider alternative institutional structures. The review should not rely solely on submissions to this consultation, recognising that institutional design requires specialised expertise and system-level analysis.

A future review could examine alternative governance structures that strengthen independence, accountability and long-term regulatory performance. This may include consideration of a commission-style national authority operating under a clear statutory mandate, with appropriate separation from political cycles and defined responsibility for both code development and post-implementation oversight. Such arrangements have the potential to enhance technical credibility, regulatory stability and stakeholder confidence.

Key elements of an effective governance model could include:

- **A strengthened, independent advisory role for the ABCB**
The ABCB should be positioned and resourced as a genuinely independent technical authority, responsible for:
 - developing NCC provisions
 - overseeing regulatory impact analysis
 - advising Ministers on the technical merits, costs and benefits of proposed changes.

This role should be supported by transparent appointment processes, fixed terms, and governance arrangements that prioritise technical expertise and independence, rather than jurisdictional representation.

- **Clear delineation between advice and decision-making**
Governance arrangements should explicitly recognise that:
 - the ABCB provides independent technical and regulatory advice

- Ministers determine whether to accept that advice, informed by broader policy considerations.

This clarity would reduce politicisation of technical matters and improve confidence in both the advice provided and the decisions taken. Current practice, where Ministers effectively approve or amend technical content late in the process, indicates that existing governance settings are not functioning as intended.

- **Transparent treatment of advice and decisions**

Should Ministers depart from independent advice, governance processes should require:

- clear documentation of the rationale for doing so
- public visibility of where and why changes have been made.

This would strengthen accountability while preserving ministerial authority.

- **Adequate and stable resourcing**

Independent advice is only credible if it is well-resourced. The current funding model for the ABCB has not kept pace with expanding expectations, including implementation of the recommendations in the Building Confidence Report, addressing climate resilience, and increasingly complex technical scope. Sustainable funding arrangements are essential to attract and retain specialist capability and maintain regulatory quality.

- **Direct engagement with relevant Ministers**

In addition to engagement with Building Ministers, the ABCB must be provided a clear and formal pathway to engage directly with other relevant Ministers where portfolio responsibilities intersect. We note the BMM interaction with the Energy and Climate Change Ministerial Council (ECMC). This is an important mechanism to ensure that buildings continue to play an important demand-side role for emissions reduction. We also believe that enabling a pathway for direct engagement with Planning Ministers, where the planning portfolio is not held by a jurisdiction's designated Building Minister, is important to support policy coherence, system integration and the timely resolution of cross-regulatory tensions. Clear ministerial communication channels reduce the need for indirect or workaround engagement mechanisms, improving decision clarity, regulatory alignment and overall system efficiency.

4. What is the optimum cadence for making changes to the NCC and what is the best way of introducing changes to the NCC?

GBCA supports retaining a regular update cycle, with flexibility to address critical issues where needed. The current cadence is three years, but in practice, these largely means every six years with alternating focus on residential and commercial (noting that some updates are included for material issues of health and safety).

There is wide support for the current three-year cycle, which is seen as balancing stability with responsiveness. More frequent or 'ad hoc' updates are considered administratively burdensome, while longer cycles risk entrenching outdated standards. For example, NCC 2022 addressed provisions that had not been updated for many years. For many in the residential construction industry, this represented a sharp increase in requirements and significant changes in practice.

GBCA urges a renewed commitment from all Building Ministers that the current pause applied to NCC 2028 until 2029 will not be extended.

Providing industry with clear signals of the changes ahead

GBCA considers that introducing changes to the NCC in future will be most successful when stakeholders have a clear understanding of key changes that can be expected over time. One of the key issues with the update process is that there is no clear line of sight for industry to know what changes are on the horizon until the consultation papers are released by the ABCB.

The updated Trajectory for Low Energy Buildings provides some guidance about the changes we will need to make to the way we design, construct and operate our buildings. Developing a roadmap aligned with the Trajectory, with key signals about the stepped changes to expect over time will help industry to prepare and build capacity well ahead of changes. For example, while GBCA is not advocating for further lifting the NatHERS requirement for homes beyond 7 stars, clear signals are needed to indicate when homes will be required to be net-zero-ready and when both homes and buildings will be required to be all-electric. This is critical to align the buildings sector with Australia's net zero emissions commitment, while providing industry with plenty of time to plan for changes.

Climate resilience is a critical priority area for planning, developing and communicating the changes we must integrate into the NCC. As noted in the response to Q1, while the BMM has directed that climate resilience should be explicitly included in the ABCB's objectives, this has not yet been resourced appropriately.

***Please note that the following questions have been renumbered due to numbering error in the discussion paper:**

5. What should the role of the NCC be? Are there opportunities for the NCC to set minimum standards but provide pathways that effectively encourage the adoption of best practice?

The primary role of the NCC should be to set clear, nationally consistent minimum standards that provide a safety, health, amenity and efficiency baseline for buildings across Australia. As a minimum standards instrument, the NCC should function as a regulatory safety net, giving certainty to industry and governments while supporting productivity, consistency and community confidence.

At the same time, there is a strong opportunity for the NCC to more clearly communicate that minimum standards are just that – the minimum – while providing pathways that encourage the voluntary uptake of best practice.

Minimum standards as a clear baseline

GBCA supports a minimum standards framework for the NCC. Minimum standards are essential to ensure acceptable building outcomes and to prevent poor-quality construction, particularly in a federated system where inconsistent adoption and enforcement already create complexity. Clear minimum standards also provide a foundation upon which innovation and higher performance can occur.

We note that there has been persistent commentary from some industry and government stakeholders that characterise energy efficiency provisions within the NCC as best practice or an optional extra, rather than a vital minimum standard. The energy efficiency provisions agreed and finalised in NCC 2022 for residential buildings requires homes to meet a 7 star NatHERS rating. Homes designed to achieve a minimum standard of thermal comfort is a critical health and safety issue. We commend the clear commitment detailed in the discussion paper to maintain the NCC 2022 provisions and urge all jurisdictions to adopt and implement these to safeguard occupants in a rapidly changing climate.

Communicating the distinction between minimum and best practice

A key challenge is that NCC provisions are often perceived or taught as best practice, rather than as a minimum standard. This has contributed to resistance to change and confusion about the intent of the NCC.

There is an opportunity for the NCC to more explicitly distinguish between mandatory minimum requirements and voluntary best practice guidance, including through clearer language, structure and

supporting materials. Technical standards already make this distinction through mechanisms such as the use of “shall” and “should”; similar principles could be applied more consistently across the NCC framework.

Pathways to encourage best practice

We note that the primary role of the ABCB remains the setting of minimum standards. It is reasonable that a secondary role of the ABCB, could be to continue the development of best practice and/or advisory note content – but this should not be done at the cost of reducing resources dedicated to the minimum standards function.

With investment into an updated and interactive NCC interface, there could be options for users to access information about voluntary best practice standards, benchmarks and examples. Industry is already familiar with NABERS and NatHERS, but enhanced information to encourage uptake beyond NCC requirements can help to drive change. Green Star² is Australia’s leading best practice rating system and another example that could be showcased in a way that helps lift awareness and uptake.

This approach would help position the NCC as a stable regulatory baseline, while encouraging builders and other industry practitioners to embrace innovation and higher performance through voluntary mechanisms.

6. What parts of the NCC could be improved to remove complexity, ambiguity or duplication?

Undoubtedly, the organic growth and development of the NCC has led to fragmented treatment of key concepts. For example, energy efficiency is presented as a separate section rather than a result of good building practice. This siloed approach undermines integration and usability.

We note that the ABCB has conducted a range of activities in this space over the years (e.g. new information architecture as part of NCC 2022 and Plain English simplification).

GBCA supports careful review and reforms to the NCC that prioritise structural simplification, clearer drafting, expanded diagrams and more intuitive, user-centred formats. Improving regulatory clarity and accessibility can reduce compliance friction, support more consistent interpretation and enhance labour efficiency.

GBCA supports longer-term reforms aimed at improving integration across the NCC, referenced Australian Standards and relevant jurisdictional requirements. A more cohesive and functionally aligned information framework would reduce duplication, lower transaction costs, and enhance overall understanding.

7. How can affordability and productivity implications be better considered in the NCC process (e.g., alternative approaches to presenting regulatory impact analysis)?

A regulatory impact analysis process is already in place, but GBCA agrees that this process could be strengthened to be more effective and robust.

GBCA supports reform of regulatory impact analysis to better reflect whole-of-life costs, the costs of inaction, opportunity costs related to climate change, public benefits and equity outcomes.

The Productivity Commission’s recent inquiry report on Investing cheaper, cleaner energy and the net zero transformation³, confirms that:

- The benefits of adaptation are greatest when we act early. Delays risk significant avoidable losses.
- The true benefits of adaptation, and the risks and costs of adaptation, are likely to be much higher than reflected in the direct damage estimates alone.

² <https://new.gbca.org.au/green-star/rating-system/>

³ <https://www.pc.gov.au/inquiries-and-research/net-zero/report/>

- Given the potential for compounding, cascading, and concurrent hazard events, actual costs could escalate well beyond current projections.

Reforming regulatory impact analysis process could include a consultation process to agree on and publish key parameters ahead of the regulatory impact analysis process getting underway. For example, seeking consensus on a carbon price, whole-of-life cost methodologies, and calculating the benefits of actions and the costs of inaction, especially in relation to resilience.

8. Do you find it difficult or costly to comply with the NCC? If so, what would make it easier and more cost effective to comply without compromising building quality and safety?

GBCA supports strengthening national compliance capability and addressing workforce skills as a core component of NCC reform. We note that these were recommendations of the Building Confidence Report.

While increased costs can accompany updates to regulation, there are many ways these can be reduced or mitigated. We note the work of many industry bodies, independently or in partnership with government, as well as the ABCB, to develop guidance to optimise aspects of design and material choices and minimise costs. Greater investment in developing appropriate guidance and capacity building for industry in line with planned updates to regulation will have a range of positive impacts for both industry and the community.

9. How do state and territory variations impact cost and productivity? Which of these variations have the greatest impact?

GBCA supports harmonisation of state and territory variations wherever possible to reduce unnecessary regulatory burden. However, we note that some jurisdictions are not content to wait for all jurisdictions to 'catch up' when it comes to implementing NCC updates or select variations, particularly those that contribute to emissions reduction and climate adaptation goals while also benefitting households.

We reiterate the need for jurisdictions to recommit to supporting consistent adoption and implementation of updated NCC editions so that the lag in implementation timelines does not continue to lengthen. Delaying adoption and implementation of updates only shifts costs, rather than avoids them.

Additionally, GBCA notes that high levels of variation between jurisdictions regarding renovations and upgrade triggers introduce significant cost and administrative complexity. These areas warrant targeted attention as part of broader efforts to improve national consistency, regulatory efficiency, and system performance. For example, the NCC does not currently provide dedicated pathways or effective consideration for retrofit projects, which may result in technical non-compliance under the current code. Any work in this area should be undertaken in close consultation with industry bodies which are, in many cases, working on material to articulate issues and ways they could be addressed. For example, the Australian Glass and Window Association (AGWA) and its work on developing potential retrofit pathways for windows.

10. How could the NCC be improved to make it easier to understand and use?

GBCA supports digitisation and user-centred redesign of the NCC to meet the needs of diverse users. We recognise that this process may take some time to design and implement – and this will require additional funding for the ABCB.

We note that the creation of explanatory content to sit alongside the NCC clauses, unpacking the meaning, the intent behind them, and notes to aid practitioners in compliance with them, would be helpful.

As noted in the response to Q5, with investment into an updated and interactive NCC interface, there could be options for users to readily access this kind of information. Noting that much of the content could potentially be developed by key industry stakeholders, with appropriate resourcing for the ABCB to review/validate the content before publication.

11. How could the NCC better interact with regulations that sit outside the NCC (e.g. with international standards and Australian Standards referenced in the NCC)?

GBCA supports sponsored digital access to building and construction standards. This will deliver immediate benefits. However, a satisfactory process for financial support for those developing and managing standards needs to be agreed.

A long-term solution will also involve complementing access with interpretation tools through an AI-generated implementation framework in partnership with industry.

12. How do you access the NCC (e.g. on a device or via a printed copy)? Do you find it easy to locate and use? What would make it easier to use?

Nil response.

13. How could the NCC better incentivise innovative ways of building? Does the performance solution pathway adequately promote innovation and new approaches or are there other approaches to more effectively encourage these outcomes?

GBCA supports reforms that increase confidence in performance solutions and remove systemic barriers to innovation. Performance pathways are designed to be considerate of complexity, an essential consideration as we encourage innovation to tackle emerging priorities such as lowering embodied emissions in construction.

Innovation in the Australian building sector can be constrained by regulatory uncertainty (including a lack of consistency across jurisdictions), reference standards being outdated, limited jurisdictional regulator capability, insufficient skills and/or capability and an increasing reliance on 'deemed to satisfy' (DTS) pathways. The performance pathway is considered by many as too challenging or cost prohibitive. From a commercial perspective, it is perceived as overly costly to use the performance pathway, mainly because of the compliance burden.

Improved confidence in performance pathways needs to be an identified, desired outcome of any broader governance and compliance reform. This will help to reduce risk for those who want to innovate. Where solutions have been rigorously tested, validated and proven, they could be incorporated into DTS provisions to improve regulatory certainty, reduce transaction costs and enable broader market adoption. This may occur within the NCC itself or provided as separate documents produced by the ABCB. It may also benefit the ABCB and jurisdictional building regulators to work more collaboratively with their building mechanisms to encourage more diverse housing types to enhance supply. For example, the NSW Housing Pattern Book offers a diverse collection of high-quality and flexible designs to suit many sites.

See response to Q15 for further information.

14. How could the NCC better support diverse types of housing (e.g., medium density, commercial retrofits)?

GBCA supports ensuring the NCC adequately accommodates a wide range of housing typologies, including medium density and retrofit projects. So-called 'non-standard' housing types are increasingly mainstream and should be treated accordingly.

GBCA supports enabling innovation and expanding support for a more diverse range of housing types while maintaining a clear and robust regulatory safety net. The way that the NCC is currently designed (by way of mandating performance rather than prescriptive outcomes) is intended to safeguard health, safety and sustainability outcomes, as well as facilitate the adoption of new technologies, materials, construction

methods and housing models. It is likely the structure of the NCC may confuse the industry, especially when it relates to apartments or mixed-use buildings.

Additionally, it is vital to support reuse and adaption of existing buildings wherever possible to address the objectives of reducing embodied carbon, improving circular outcomes and respect to the adaptive reuse of commercial buildings, helping to overcome the housing supply crisis (noting that in many cases, adaptive reuse and fitouts have a faster turnaround time than new builds, providing an important pathway in addressing the housing supply crisis).

Reducing regulatory barriers, improving access to material testing and providing reuse pathways through the NCC will assist in these aims. The Green Star rating tools have an increased focus on a circular economy – opening up the opportunity for projects who reuse materials and fitouts to be recognised through the rating tool. Market leaders are demonstrating how reuse and adaptation are leading desirable outcomes and examples of best practice.

Please also see responses to Q13 and Q15 which relate to encouraging innovation.

15. Are there barriers to introducing new building products and methods? What are they and how could the NCC be improved to support their uptake by the construction industry?

GBCA supports timely updating of referenced standards and investment in regulator and industry capability to enable innovation.

Outdated standards and limited regulatory capability are key barriers to innovation and modern methods of construction. In the DTS pathway, if the standards and NCC are not updated, then new building products and methods cannot be adopted. This is especially true if we have a lack of industry and regulator skills/capability.

We recommend the implementation of the National Building Products Coalition's National Building Assurance Framework. This provides a nationally agreed response and clear pathway in response to the Building Confidence Report's Recommendation 21: That the Building Ministers' Forum agree its position on the establishment of a compulsory product certification system for high-risk building products.

Enabling the capture and sharing of data, both positive and negative, will also be critical for an NCC that encourages innovation. Digital Product Passports (DPPs) enable the tracking and sharing of product data. With their provision, risk can be better managed through the ability to track products through the supply chain and their life cycle.

Australia should look to international examples for approving and encouraging innovative products, techniques and modern methods of construction. Currently, there is a siloed approach to approvals and perceived risk may be allowed to outweigh benefits. Because there is limited data sharing, and a very conservative approach to risk, industry do not use data from other regions to support new materials to be used in Australia. With modelling becoming more advanced, there are greater opportunities to take information that already exists and extrapolate for use here in Australia. While it will be critical to drive local innovation, Australia is ultimately a small market and much of the innovation we will need for a more productive and responsive construction industry will come from overseas.

For additional consideration: Climate resilience and alignment with energy and emissions policy objectives

Resilience

GBCA supports framing both energy efficiency and climate resilience as core minimum standards within the NCC, reflecting their direct relationship to occupant health and safety, climate risk realities and long-term economic performance. These considerations are fundamental elements of building performance that enhance community and infrastructure resilience, and household wellbeing.

GBCA acknowledges the direction provided through the June 2024 Building Ministers' Meeting Communiqué, in which Ministers agreed to elevate climate resilience as a specific objective of the ABCB. This commitment recognises the growing importance of ensuring Australia's buildings are better equipped to withstand more frequent and severe climate-related hazards, reduce long-term economic losses and support safer, more resilient communities.

The Building Ministers' agreement reflects an important policy evolution: resilience is no longer a discretionary or supplementary consideration, but an essential component of baseline building performance. According to the Climate Council's 2025 report, *At Our Front Door: Escalating Climate Risks for Aussie Homes*⁴, almost 15% of Australian properties already face moderate to high climate risk (excluding heat) and 66% of housing stock is vulnerable to more intense and frequent heatwaves.

GBCA strongly supports this direction and emphasises that resilience outcomes are most effectively achieved when embedded within nationally consistent minimum standards rather than optional or fragmented requirements.

Embodied carbon

The Communiqué further signals a clear intention to strengthen the alignment between the NCC and Australia's broader transition towards net zero emissions. Ministers' direction to introduce voluntary embodied carbon reporting pathways, alongside investigations into future minimum standards, reinforces the NCC's role as a central instrument supporting long-term economic, environmental and risk-management objectives.

GBCA has undertaken research which begins to show the extent of the embodied carbon challenge. Our report, *Our homes weigh a tonne – Of carbon per square metre*⁵, shows that constructing and furnishing a typical detached home in Australia results in 185 tonnes of upfront carbon emissions.

We also note that the European Union will adopt DPPs in 2027. Australia has an opportunity to set a clear direction for future alignment. As well as the importance to achieving net zero targets, this will be critical to ongoing opportunities for innovation – both the ready adoption of international products and practices into the Australian market, and in creating an environment for successful export of Australian products and practices.

GBCA emphasises that it is critical that the ABCB is appropriately resourced to progress work on resilience and embodied carbon immediately, so that well-considered and analysed options are ready for inclusion as part of the NCC 2029 consultation.

⁴ https://www.climatecouncil.org.au/wp-content/uploads/2025/04/CC_CV-Report-At-Our-Front-Door-2025_Final.pdf

⁵ <https://gbca-web.s3.amazonaws.com/media/documents/our-homes-weigh-a-tonne---technical-report-v1.pdf> ;
<https://gbca-web.s3.amazonaws.com/media/documents/our-homes-weigh-a-tonne---call-to-action-v1.pdf>