

18 August 2025

Victorian Energy Upgrades team  
Department of Energy, Environment and Climate Action  
Victorian Government

Via email: [energy.upgrades@deeca.vic.gov.au](mailto:energy.upgrades@deeca.vic.gov.au)

Dear Victorian Energy Upgrades team

**RE: Proposed design of the new Victorian Energy Upgrades Ceiling Insulation Activity**

The Green Building Council of Australia (GBCA) welcomes the opportunity to provide input to Victorian Energy Upgrades (VEU) Ceiling Insulation Activity. We commend the introduction of ceiling insulation retrofits as an activity under the VEU program.

In [Every Building Counts: For state and territory governments](#), GBCA and the Property Council of Australia recommend a range of actions that the Victorian Government can take to accelerate the transition to a more sustainable and equitable built environment. This includes Recommendation 2.3 - Create a strategy and incentives for quality retrofits for existing commercial and residential buildings to support a just transition.

GBCA applauds other significant steps already taken by the Victorian Government to achieve long-term emissions reductions, such as prohibiting new residential gas connections, launching the residential electrification grants program, phasing out gas hot water systems and the introduction of new minimum standards for rental homes and public housing.

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

- 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 advocate policies and programs that support our vision and purpose.
- We collaborate with our members and other stakeholders to achieve our mission and strategic objectives.

As noted in [our submission](#) to the strategic review of the VEU program, prioritising a whole-of-building approach that integrates energy efficiency and electrification measures is a key opportunity for the program. Making an incentive for insulation available within the VEU program is an important part of such an approach and will assist in realising a range of benefits:

- Minimising energy demand through improvements in energy efficiency makes a critical contribution to emissions reduction.
- Minimising energy demand also leads to lower bills for households and reduce demand on the electricity grid.

- Improvements to the energy performance of a building enables appropriate sizing of heating and cooling appliances, as well as solar and battery equipment.
- Properly insulated buildings can also offer improved resilience to extreme weather and improved occupant comfort and health.
- The development of an insulation installation program will provide opportunities for upskilling workers and will create jobs.

Please find a copy of the consultation survey attached. GBCA does not offer comment on the design of the ceiling insulation activity, or technical aspects of its implementation. However, we note the Victorian Government's commitment to engaging with industry experts to ensure that all aspects of the ceiling insulation activity, including procedures, training and accreditation, will meet appropriate requirements and best practice standards.

To arrange further discussion, or for additional information about any of the points made above, please do not hesitate to contact Katy Dean, Senior Policy Adviser, via email at [katy.dean@gbca.org.au](mailto:katy.dean@gbca.org.au).

Yours sincerely

A handwritten signature in dark ink, appearing to read 'D. Rooney'.

Davina Rooney  
Chief Executive  
Green Building Council of Australia