

17 March 2026

Climate Change Policy Team
City and Environment Directorate
ACT Government

Via email: climatechange@act.gov.au

Dear Climate Change Policy Team

RE: Developing a new Climate Change Strategy for the ACT

The Green Building Council of Australia (GBCA) welcomes the opportunity to provide input to this consultation on developing the next Climate Change Strategy for the ACT. GBCA commends the ACT Government's ambition and leadership on climate action to date including achieving the 100% renewable energy target and eliminating new gas connections in many areas of the ACT. We recognise that the next ACT Climate Change Strategy seeks to maintain existing climate actions while tackling even more complex challenges.

GBCA supports the ACT Government's proposal to establish the Climate Change Strategy as an overarching, adaptable framework, supported by shorter-term action plans that can respond to emerging risks, technologies and community needs over time. We particularly welcome:

- Increased emphasis on adaptation and resilience, alongside emissions reduction.
- A stronger focus on fair and inclusive transition, including support for households, workers and businesses
- The intention to embed climate action across government, rather than treating it as a standalone policy issue.

GBCA looks forward to continuing to work with the ACT Government and ACT industry to accelerate emissions reduction efforts and build a more resilient, equitable and sustainable ACT. We welcome the opportunity to participate in development of the action plans.

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.

Green Star is Australia's most widely used sustainability rating system for the design, construction and performance of buildings – including social infrastructure – fitouts and communities. Green Star aims to transform the built environment by:

- reducing the impact of climate change
- enhancing our health and quality of life
- restoring and protecting our planet's biodiversity and ecosystems
- driving resilient outcomes for buildings, fitouts, and communities
- supporting and rewarding the development and use of sustainable products and materials
- contributing to market transformation and a sustainable economy.

GBCA offers the following comments in response to the sections set out in 'Developing a new Climate Change Strategy for the ACT: ACT Government discussion paper' (the discussion paper) to maximise its impact:

Embedding equity, wellbeing and resilience

GBCA supports the ACT Government's position outlined in the discussion paper that:

Ensuring that electrification, efficiency improvements and thermal comfort upgrades are accessible across all households is key, as is ensuring that all areas of our community are becoming increasingly resilient to the impacts of climate change.

We also note that the proposed strategy aligns with key leading global megatrends that are shaping our built environment. These include health, equity and resilience together with climate action and resources & circularity. These megatrends also shape GBCA's priorities and we aim to translate these into practical pathways to support industry to respond and adapt. This approach has recently been reinforced by the results from GBCA's annual member survey which showed that resilience, health & wellbeing, and equity remain front of mind for our members as well.

GBCA commends the work and initiatives in place so far to support building upgrades to improve thermal comfort, energy efficiency and reduce urban heat. We commend the minimum standard in place to ensure residential rental properties have adequate ceiling insulation and commend the ACT Government's leadership in the timely implementation of updates to the National Construction Code which has a critical role to play in ensuring that new homes and buildings will be more resilient to a changing climate.

Next steps

Last year, GBCA, in partnership with Property Council of Australia and Climateworks Centre released the [Built Environment Ambition report](#)¹. The report showed that rapid decarbonisation of Australia's built environment, accompanied by electricity sector decarbonisation, can see annual emissions reduced by 66 MtCO₂e by 2035 compared to 2025 levels. The pathway outlined in the report could achieve a 93 per cent reduction in annual operating emissions from residential buildings and a 90 per cent reduction from commercial buildings, by 2035 compared to 2025 levels.

The modelling shows that this significant abatement in homes and buildings can be achieved with a range of key actions. In particular:

1. electrifying buildings to reduce direct emissions. This means eliminating gas from all new developments and progressively phasing it out of existing buildings. Gas-fuelled space conditioning (heating and cooling) should be replaced with electric systems, gas cooktops swapped for efficient induction alternatives, and gas-fuelled hot water units transitioned to electric hot water technologies.
2. improving the energy performance of appliances by installing efficient electric appliances or services such as HVAC and lighting.

¹ <https://gbca-web.s3.amazonaws.com/media/documents/beam-report-final.pdf>

3. improving the energy efficiency of buildings' external envelope or the 'thermal shell' through upgrades to external walls, roofs and ground floors.²

GBCA recognises and applauds the ACT's leadership in preventing new gas connections for homes and buildings in most areas of the ACT, as well existing initiatives to support energy efficiency and electrification upgrades for homes and businesses.

GBCA urges the ACT to commit ongoing funding to effective initiatives already in place and to look for opportunities to strengthen and expand these where possible, while also considering additional mechanisms. A range of funding options and incentives are needed to meet the needs of diverse households and businesses if the ACT is to meet its net zero by 2045 goal as are measurable targets and milestones.

Natural environment

GBCA agrees that the links between our natural and built environments must be strengthened to connect people and nature and support healthy communities. We commend the commitment to establish the Office of the ACT Government Landscape Architect to support more effective ecological planning and connectivity and ensure landscape is integrated into the planning system.

Next steps

GBCA urges the ACT Government to consider how the GBCA's [Nature positive roadmap: For new developments](#) can help to inform plans, policies and real action to strengthen the links between the natural and built environments.

The roadmap translates global biodiversity targets into actionable, measurable steps for the built environment. Success will depend on strong policy integration, consistent data, and the inclusion of First Nations knowledge and leadership. The roadmap proposes five core principles, supported by measurable targets from today to 2050. The principles and 2035 targets are:

- Prevent nature loss – Commit to no net loss and deliver net gain outcomes.
- Increase and connect nature – Restore ecosystems and reconnect fragmented habitats.
 - 10% biodiversity net gain
- Drive circularity – Minimise waste and pollution through circular design.
 - 10% circularity rate (current Australian rate is 4.5%, global rate is 7.5%).
 - At project level the target is 10% by 2030 and 20% by 2035.
- Choose low-impact materials – Avoid ecosystem harm from construction supply chains.
 - Manufacturers of top 10 materials have biodiversity net gain targets.
- Invest in nature – Embed funding for restoration and regenerative outcomes.
 - A portion of contract value invested in nature improvement & restoration.

Built environment

GBCA strongly supports the inclusion of the built environment as a distinct theme in the next Climate Change Strategy. Buildings, infrastructure and precincts are central to both the causes and consequences of climate change. They shape energy demand, transport patterns, urban heat exposure, public health outcomes and community resilience. GBCA commends the range of work the ACT Government is undertaking to accelerate the sustainable transition of the built environment including:

² Beyond the scope of the Built Environment Ambition report, but of critical importance and the following activities: on-site generation and storage of renewable energy such as rooftop solar and batteries, demand management, reducing embodied carbon, and reducing refrigerants with high global warming potential.

- upgrading public housing with insulation and electrification
- electrifying government assets
- regulation for minimum energy efficiency standards for residential rental properties
- energy efficiency disclosure for residential properties
- pilot projects for complex building types, such as apartments, to address electrification challenges.

Next steps

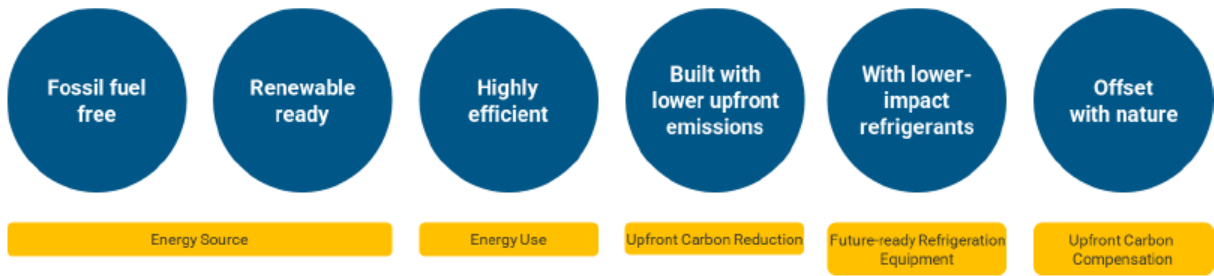
GBCA agrees with the position outlined in the discussion paper that the holistic consideration of our built and natural environments with our water, energy and transport systems will be crucial to meeting our climate goals and enhancing Canberra's liveability.

GBCA notes the potential actions outlined in the discussion paper and makes the following additional comments:

- **Strengthen and expand proven programs and commit to new incentives to fill gaps** – As noted in the comments relating to 'Embedding equity, wellbeing and resilience' above, ongoing commitment to funding to effective initiatives already in place and strengthening and expanding these where possible is critical.
- **Nature-based solutions** – As noted in the comments relating to 'Natural environment' above, consider how the GBCA's [Nature positive roadmap: For new developments](#) can help to inform plans and policies to strengthen the links between the natural and built environments.
- **Minimum standards for rental properties, disclosure requirements, and other regulatory and policy actions** – GBCA agrees that further consideration of how these initiatives are influencing the housing and commercial building markets will be critical. This could include:
 - Consideration of how minimum standards for rental properties can be lifted over time.
 - Support for the Australian Government-led project to expand NatHERS for existing homes and to align this work with the ACT's own leadership in this area to improve residential energy disclosure.
 - Ongoing leadership in the timely implementation of the National Construction Code and support for industry to adapt to changes.
- **Improve how buildings communicate with and respond to the electricity grid in real time** – GBCA urges the ACT Government to explore how grid-interactive buildings and precincts can be encouraged in the ACT by sharing case studies and considering incentives and pilots. Please see GBCA's [The future is electric: A practical guide to grid-optimised precincts](#) and [From net zero to zero: A discussion paper on grid-interactive, efficient buildings](#).
- **Reducing embodied emissions in construction through promoting the use of low carbon materials and adaptive reuse** – GBCA urges the ACT Government to lead by example in reducing embodied carbon in its own projects and actively sharing information with industry about how this is achieved. GBCA recommends setting targets for reduced embodied carbon in government procurement and reporting on achievements.

GBCA notes the [ACT Sustainable Buildings Pathway](#) covers the actions areas detailed in the discussion paper. We encourage the ACT Government to strengthen its commitment to the actions highlighted in the Sustainable Buildings Pathway with appropriate funding and milestones for achievement.

We also refer to GBCA's Climate Positive Pathway which has been developed with industry as clear guidance for ensuring our new and existing buildings are built or retrofitted for a climate positive future. The Climate Positive Pathway is embedded in the Green Star rating system but also offers core principles for guiding buildings and built environment policy. These principles are below and more information is available on the [GBCA website](#):



Energy

GBCA commends the ACT Government’s leadership and action to date in supporting consumer energy resources such as rooftop solar, batteries, smart appliances, and electric vehicles through initiatives like the Sustainable Household Scheme. We recognise and commend that new gas network connections are already prevented in most areas of the ACT, and the government is working to upgrade and electrify public and community housing.

Next steps

As outlined in the responses to ‘Embedding equity, wellbeing and resilience’ and ‘Built environment’ above, GBCA urges the ACT Government to continue investing in the transition away from fossil fuel gas and support for uptake of consumer energy resources, in particular for lower-income households. A range of funding options and incentives are needed to meet the needs of diverse households and businesses if the ACT is to meet its net zero by 2045 goal.

Government

GBCA welcomes the emphasis on whole-of-government leadership outlined in the discussion paper. GBCA commends the ACT Government’s commitment to achieving zero emissions from government operations by 2040 which will require a government-wide approach to procuring and managing government assets. Procurement will also play a critical role in actions to address Scope 3 emissions. The Low Carbon Concrete policy, which outlines a phased approach to increase the use of low carbon concrete in government projects, is an important step.

Next steps

GBCA supports the ACT Governments program of electrification for fossil-fuelled government assets. We note and commend the commitment made in the discussion paper to improve transparency and accountability and explore further opportunities to measure and report government scope 3 emissions, as well as to consider opportunities to incorporate environmental considerations in procurement practices.

GBCA is pleased to recognise recent commitments to Green Star certification for a range of government assets, including:

- Canberra Hospital Expansion which achieved a 5 Star Green Star Design & As Built v1.3 certification. The new Critical Services Building is the first fully-electric hospital building in Australia.
- Strathnairn School, ACT’s newest school, is on track to achieve 5 Star Green Star Buildings v1 certification.

Commitment to Green Star certification for government-owned and leased assets will support transparency and accountability in procurement and reporting for a range of sustainability and environmental outcomes.

Other emissions

We recognise the ACT Government actions underway to manage and reduce waste and emissions while working towards a circular economy. In addition to the action areas noted in the ‘Built environment’ section of the discussion paper, the [ACT Sustainable Buildings Pathway](#) addresses several additional areas

noted in this section of the discussion paper including waste and working towards a circular economy, scope 3 emissions and refrigerants.

Next steps

Circular economy – We note the ‘ACT Circular Economy Strategy and Action Plan 2023-30’ is also already driving positive outcomes and urge ongoing commitment to the actions detailed in this document.

Scope 3 emissions - GBCA agrees that as part of managing and reducing scope 3 emissions, it will be important for the ACT Government to consider how we monitor the emissions arising from consumption and construction supply chains. As noted in the discussion paper, government procurement has an important role to play in leading industry towards best practice.

We point to GBCA’s ongoing work in these areas and several useful resources including:

- [A nature roadmap for the built environment: A discussion paper for the supply chain](#)
- [Australia’s waste\[d\] opportunity](#)
- [A practical guide to circular procurement: For new buildings and major refurbishments](#)
- [Scope 3 emissions - Measuring impact: Why scope 3 deserves our attention more than ever](#)
- GBCA’s [Responsible Products Program](#).

Refrigerants – We note that refrigerant emissions is the third highest (after Transport and Fossil fuel gas) contributor of emissions in the ACT. In GBCA’s recently released discussion paper, [Freeze frame: Refrigerants as long-term building infrastructure](#), we note several important actions for the supply chain, industry associations and government over the next several years. These are to:

1. Raise awareness among building owners and designers and build skills across the workforce to support low-impact refrigerant use.
2. Improve and create new standards of accounting for refrigerant use and impacts.
3. Increase investment by supply chain in future-proof systems using lower harm refrigerants and solutions for transitioning existing equipment.
4. Enhance recovery and destruction of refrigerants (currently estimated at <20%) through effective stewardship
5. Establish direction for the built environment through a clear regulatory framework, roadmap and targets.

We encourage the ACT Government to look to other jurisdictions already implementing guidance for low Global Warming Potential (GWP) refrigerants in government assets such as the Northern Territory Department of Logistics and Infrastructure’s (DLI’s) ‘Mechanical and Hydraulics Minimum Design Standards’ and City of Sydney’s ‘Buildings Specification – ESA 04 Environmentally sustainable assets’.

We welcome the opportunity to continue to work with the ACT Government on all priorities and actions discussed above. To arrange further consultation, or for additional clarification on any of the points in this submission, please do not hesitate to contact Katy Dean, Senior Policy Adviser, via email at katy.dean@gbca.org.au.

Yours sincerely



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