

29 January 2026

Dr Amanda Cohn MLC
Chair
Portfolio Committee No. 2 – Health
Parliament of NSW

Via online Inquiry portal: <https://www.parliament.nsw.gov.au/committees/inquiries/Pages/lodge-a-submission.aspx?pk=3152>

Dear Dr Cohn

Re: Inquiry into clean indoor air

The Green Building Council of Australia (GBCA) welcomes the opportunity to provide feedback to the inquiry into clean indoor air. Indoor air quality is an essential feature of a healthy, resilient and sustainable building. We encourage safe indoor air quality through the Green Star rating system and various initiatives and programs.

We supported a landmark discussion on indoor air quality at COP30 in Belém, Brazil, highlighting how buildings can protect health and wellbeing in a changing climate. The event, Indoor Air: The Climate, Health and Energy Nexus, was held at the Australia Pavilion and brought together experts from government, academia and industry to explore how building design and management can safeguard people from the growing health impacts of climate change.

In this submission, GBCA provides comments against the Inquiry's Terms of Reference, including the following key points:

- Poor indoor air quality negatively affects health, productivity, safety, and equitable access to public spaces.
- Rating tools like Green Star and NABERS help set benchmarks and drive improvements in Indoor Air Quality (IAQ) for new and existing buildings, including schools and healthcare facilities.
- IAQ should be recognised as an accessibility and inclusion issue, in alignment with the Disability Discrimination Act and recommendations from the Safer Air Project.
- Government leadership is needed to set IAQ standards, apply rating tools in public assets, and prioritise IAQ in key settings such as education, healthcare, disability, and workplaces.
- There is a lack of national IAQ standards and consistent monitoring in Australia, making it difficult to compare building performance and implement effective regulation.
- Improving IAQ supports climate resilience, pandemic preparedness, and broader decarbonisation efforts, including transitioning away from fossil fuels in buildings.

About GBCA

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 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.
- We rate the sustainability of buildings, fitouts and communities through Australia’s largest national, voluntary, holistic rating system – Green Star.

About Green Star

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
- contributing to market transformation and a sustainable economy.

GBCA provides the following comments in response to the Terms of Reference:

(a) the impacts of poor indoor air quality due to airborne pollutants and pathogens on:

(i) health

(ii) productivity and economic output

(iii) work health and safety

(iv) equity of access to public services and spaces

Because we spend most of our time within buildings, the built environment has a significant influence on our health and wellbeing. The impacts of poor indoor air quality, particularly on health, are increasingly well-documented.

In relation to indoor air quality as an issue of equity of access to public services and spaces, as well as to workplaces, GBCA encourages the Committee to consider The Safer Air Project’s report, [Safer shared air - a critical accessibility and inclusion issue](#).

While the impacts of indoor air quality on a range of productivity and economic outputs can be more challenging to quantify, GBCA notes the following resources:

- [The potential of high-performance workplaces for boosting worker productivity, health, and creativity: A comparison between WELL and non-WELL certified environments](#)
- [Health, wellbeing & productivity in offices](#)

In relation to indoor air quality as an issue of equity of access to public services and spaces, as well as to workplaces, GBCA encourages the Committee to consider The Safer Air Project’s recommendation to:

- Acknowledge IAQ as an accessibility issue that must be addressed to deliver the accessibility theme within Australia’s Disability Strategy. In addition, note that a lack of access to safe air spaces represents a potential breach of the Disability Discrimination Act 1992.

(b) indoor air quality standards and monitoring

The Green Star rating system emphasises the importance of indoor air quality, setting clear expectations for buildings that do not hinder human health with specific credits aimed at designing, construction and operating buildings with high indoor air quality results. It provides guidance on compliance with air quality standards and the challenges associated with achieving these standards.

The Green Star Buildings rating tool includes eight categories with corresponding credits, as well as a set of Minimum Expectations that must be achieved by all projects to achieve a Green Star rating. The Minimum Expectations aim to ensure all Green Star rated buildings meet a basic definition of a green building and include requirements for energy efficiency, water efficiency, building responsibly and more.

Within Green Star Building's Healthy category is the Clean Air credit. This is designed to minimise the pollutants entering the building and to reduce the risk of spread of infectious diseases. The Minimum Expectation for the Clean Air credit requires:

- **Ventilation System Attributes:** Levels of indoor pollutants are maintained at acceptable levels.
- **Provision of Outdoor Air:** A high level of effective outdoor air is provided.
- **Exhaust or Elimination of Pollutants:** Pollutants entering the building are minimised.

The Green Star Performance rating tool assesses the sustainability attributes of existing buildings through nine categories, including Indoor Environment Quality. The Indoor Environment Quality category aims to encourage and reward initiatives that increase comfort and wellbeing and reduce exposure to pollutants.

More information about the Green Star rating tools is available on the [GBCA website](#).

NABERS also offers an Indoor Environment Quality Tool for office buildings that measures several aspects of Indoor Environment, including Indoor Air Quality. Use of this rating tool has grown exponentially since its inception in 2009 as building owners and their tenants increasingly value the benefits of a healthy indoor environment. 357 buildings were rated by NABERS for Indoor Environment Quality (IEQ) in 2024-25.¹

Despite the uptake rating tools such as Green Star and NABERS IEQ, Australia does not have national IAQ standards or a consistent measuring and reporting system. This makes it hard for Australian building operators to understand how well buildings are performing and compare with others. It also limits government's ability to implement regulatory frameworks. The NABERS team has developed a proposal to develop an indoor air quality rating system to respond to and leverage increasing interest in indoor air quality standards. We encourage the Committee to consider the submission to this Inquiry from the NABERS team.

GBCA also notes The Safer Air Project's recommendation that government should:

- Set Indoor Air Quality performance standards, which effectively lower the risk of poor health outcomes from infection by airborne pathogens and other airborne pollutants for all public spaces as covered by the Disability Discrimination Act, and update the Premises Standards to include Indoor Air Quality as an accessibility feature.

(c) solutions to improve indoor air quality, including but not limited to:

(i) building design, in particular schools, health services and public buildings

(ii) retrofitted measures, including but not limited to ventilation and/or filtration systems and emerging technologies

As noted in the response to (b) above, Green Star rating tools aim to support the design, construction and operation of buildings with high indoor air quality results. Green Star has been used on more than 4770 projects, including hundreds of public buildings including healthcare facilities, schools and education facilities, libraries and community facilities, sports facilities and shopping centres. Green Star-certified buildings have helped to advance design, technologies and practices that enable better indoor air quality and embed them across industry. In particular, use of Green Star in commercial properties has driven the

¹ <https://nabers.info/annual-report/2024-2025/office-indoor-environment/>

development of design and engineering practices to deliver higher rates of outside air and dilute the prevalence of indoor pollutants, while keep energy efficiency high.

Benefits of better indoor air quality in schools and healthcare

By the time a child graduates, they have spent more time in a school building than anywhere else, apart from their home, which means it will have considerable impact on their health and wellbeing. Studies² show that well-ventilated buildings with good indoor air quality, acoustics and enhanced levels of thermal comfort, lead to better cognitive performance, sleep and a wide range of additional tangible benefits.

In Australia, a number of schools have committed to achieving a high level of indoor air quality along with a range of other outcomes to benefit the health of occupants and the environment. School Infrastructure NSW leading the way using Green Star to certify a pipeline of new school buildings. Please see the following links for more information:

- [Schooled in Green Star](#)
- [We build schools sustainably](#)

A range of useful information is available from the US Center for Green Schools, including a [series of factsheets on indoor air quality](#).

Many hospitals and healthcare facilities have a strong focus on ensuring high levels of indoor air quality to ensure that the risk of airborne infection is minimised, as well as to promote healthy environments for healing and working.

Please see GBCA and the New Zealand Green Building Council reports, [Green Star in focus: The case for sustainable social infrastructure](#), and [The case for sustainable healthcare](#) for more information about the benefits of high indoor air quality together with a range of other benefits including emissions reductions, cost savings and productivity gains.

GBCA supports The Safer Air Project's recommendation that government should prioritise implementation of IAQ performance standards in four key settings:

- Education (including early years, primary and high schools)
- Healthcare (including hospitals, primary health, allied health, pharmacies etc.)
- Disability, aged care and other residential settings
- Workplaces.

This aligns with GBCA's own advocacy for government leadership in using credible, independent building rating systems for government owned and leased buildings and facilities, including healthcare and education facilities. In GBCA and Property Council of Australia's policy platform, [Every Building Counts](#)³, we call for:

6.2 Commit to applying trusted, robust and credible building rating systems such as Green Star and NABERS in all new government projects and existing assets and accommodation.

² Harvard T.H. Chan School of Public Health. 2016. Schools for health: Foundations for student success – How school buildings influence student health, thinking and performance.

https://forhealth.org/Harvard.Schools_For_Health.Foundations_for_Student_Success.pdf

³ https://www.propertycouncil.com.au/wp-content/uploads/2023/12/GBCA_EBC-StateandTerritory-2023-PolicyDoc_FA_18Aug_Digital_LR-6.pdf

Please see [Every Building Counts](#) for more information.

(d) implications for climate resilience and pandemic preparedness

Beyond setting high benchmarks for indoor air quality, improving the resilience of buildings and the built environment is a priority focus area for GBCA. Green Star rating tools include credits focused on identifying and addressing climate risks for projects.

More broadly, GBCA is a strong advocate for a National Construction Code (NCC) that ensures Australia's homes and buildings are designed and constructed to meet the challenges of a changing climate. This includes the energy efficiency provisions agreed under NCC 2022 to ensure homes meet 7 star NatHERS to ensure better comfort, health and safety for occupants in hot and cold temperatures and provisions agreed in NCC 2025 to improve moisture and condensation outcomes and require commercial buildings to be electrification-ready.

(e) any other related matters.

Clean air starts with climate action. The same fossil fuels that heat our planet also pollute the air inside our homes, schools, and workplaces. By cutting emissions and investing in clean energy, we not only fight climate change but also protect our lungs, reduce disease, and create healthier spaces for everyone.

GBCA's [Climate Positive Roadmap for the built environment](#)⁴ establishes the steps required for new and existing buildings, fitouts and precincts to decarbonise. This means that projects aiming to achieve certification under Green Star rating tools, must be fossil fuel-free (in most cases) or have a plan to become fossil fuel-free. While the broader health benefits of decarbonising the built environment – and the broader environment – will be well understood by the Committee, we note the importance of removing fossil fuels from buildings to contribute to better outcomes for indoor air quality.

Despite regulations regarding ventilation and extraction, indoor air quality can be impacted by use of gas appliances for cooking and space heating. The report, [Kicking the gas habit: How gas is harming our health](#), highlighted a range of findings related to gas use and negative health impacts.

As well as including credits to encourage/require all-electric buildings with high indoor air quality, GBCA is a member of the Global Cooksafe Coalition. This is an alliance of leaders from the spheres of public health, property and the built environment, aid and development, renewable energy and climate change science and advocacy working together to promote universal access to safe and sustainable cooking. More information about the health benefits of electric cooking is available on their website at <https://cooksafecoalition.org/why-electric-cooking/>.

GBCA looks forward to continuing to work with the Commission and the wider NSW Government to develop priority actions to accelerate decarbonisation of the built environment. To arrange further discussion or for additional clarification of the points made above, please do not hesitate to contact Katy Dean, Senior Policy Advisor via email at katy.dean@gbca.org.au.

Yours sincerely



⁴ <https://gbca-web.s3.amazonaws.com/media/documents/carbon-positive-roadmap-discussion-paper-rev-a.pdf>

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