

22 April 2025

Suburban Rail Loop Authority
PO Box 24214
Melbourne 3001

Via email: contact@srla.vic.gov.au

Re: Suburban Rail Loop (SRL) East Draft Structure Plans and Draft Planning Scheme Amendments

Green Building Council of Australia (GBCA) welcomes the opportunity to provide feedback on the draft SRL East Draft Structure Plans and Draft Planning Scheme Amendments. We commend the Victorian Government for maintaining its focus on decarbonisation and creating net zero communities, as it implements a suite of initiatives to respond to Melbourne's projected population growth of 9 million by the mid-2050s.

GBCA recognises the Victorian Government's leadership in driving sustainability in infrastructure delivery and for recognising the need for accelerated transition to net zero by 2045 with sustainable building design. We ask the Victorian Government to ensure the draft plans and scheme amendments for the SRL are explicit in requiring certified ratings from independently verified rating schemes and remove language that promotes equivalency.

GBCA is an industry association with more than 650 member organisations, including many that work in or with the housing construction sector. 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.

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 notes that the Draft Structure Plan for each SRL East Precinct highlights the need for building climate resilience and supporting a sustainable community and one of the actions to achieve this outcome is by implementing a higher building design standard, including a 5-star Green Star Buildings rating for large non-residential buildings and multi-unit residential buildings. GBCA strongly supports this recommendation.

Furthermore, we note the objective and supporting strategy to achieve the above outcome outlined in the Draft Structure Plans:

Objective - support the accelerated transition to net zero by 2045 with sustainable building design

Strategy - introduce elevated sustainability standards to require that all new buildings greater than 5,000 m2 Gross Floor Area (GFA) apply the 5 Green Star Buildings standard (or equivalent independent standard) to maximise building sustainability performance and contribute to Victoria achieving net zero carbon emissions by 2045.

The strategy as currently expressed asks for new builds to apply the Green Star Building standard, without a requirement for certification from the GBCA. This could lead to claims of Green Star equivalency. An independent assessment from the GBCA will verify if the building has been built to Green Star Buildings standard.

Equivalency is an issue faced by many organisations managing certification schemes. In the Green Star context, this means making a self-assessment that a project's outcomes meet Green Star's benchmarks, or when a benchmark or system is used to measure a project and judged as equivalent to Green Star, but that benchmark or system lacks the rigour of the Green Star System. For more information on the issue of equivalency in the built environment, please see [article published](#) by GBCA in 2022.

The Green Star rating system and certification process is built on a quality process accredited to ISO9001 and is developed and regularly updated in consultation with industry and government stakeholders. Achieving certification guarantees that projects are compared against the most appropriate and up-to-date benchmarks and standards available. Accreditation of the Green Star certification process holds GBCA to account and ensures that Green Star ratings are auditable and replicable.

GBCA has built Green Star's reputation as a trusted trademark. Misusing the Green Star trademark breaches that trust, adds to confusion for consumers and helps to contribute to the false perception that 'equivalency' is as good as a verified outcome.

GBCA recommends that the language in the strategy is revised to remove any ambiguity and potential claims of Green Star equivalency and be replaced with the following:

"introduce elevated sustainability standards to require that all new buildings greater than 5,000 m2 Gross Floor Area (GFA) achieve a minimum 5 Star Green Star certification (or equivalent rating from other internationally recognised third-party certification scheme) to maximise building sustainability performance and contribute to Victoria achieving net zero carbon emissions by 2045".

With so many standards, rating tools, benchmarks and frameworks available, the Australian Sustainable Built Environment Council (ASBEC) published a [ratings snapshot](#) which outlines the built environment sustainability frameworks commonly used in Australia. This states:

"Some projects make claims of sustainability standards that are not independently verifiable or transparent. For example, claims that a project has 'Green Star equivalence' or has been 'designed or built to a high NABERS rating', or is 'aligned with the IS Rating Scheme'. These claims are misleading. For example, if claims are made around targeting a specific NABERS rating, these claims must be verified to be true."

In addition, the Australian Government's [Sustainable Procurement Guide](#) notes:

"Projects that claim to meet the requirements of Green Star but are not certified are potentially in breach of trademark rules and may be accused of 'greenwash'."

To arrange further discussion or for clarification of the points made above, please do not hesitate to contact Shay Singh, Senior Manager Policy and Government Relations, via email at shay.singh@gbca.org.au.

Yours sincerely

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