

16 September 2026

Modern Methods of Construction team
Australian Building Codes Board

Via email: prefab@treasury.gov.au

Dear Modern Methods of Construction team

RE: Proposed National Voluntary Certification Scheme for Manufacturers of Prefabricated Construction

The Green Building Council of Australia (GBCA) commends the Australian Building Codes Board (ABCB) on its ongoing efforts to help facilitate the uptake of modern methods of construction (MMC) at scale and welcomes the opportunity to provide input to this consultation regarding the proposed National Voluntary Certification Scheme for Manufacturers of Prefabricated Construction (the Scheme).

In principle, GBCA supports the development and implementation of a scheme that will provide an independent, nationally consistent certification pathway for manufacturers of prefabricated construction. We support initiatives that will facilitate greater uptake of innovative construction systems and manufacturing approaches, that seek to improve the efficiency, quality, consistency and sustainability of prefabricated building work and contribute to improving the productivity of the construction sector.

We note several points for consideration:

- **Relationship with national building-product assurance reforms:** The proposed Scheme's long-term effectiveness will depend on continued development of the broader national building product assurance framework, including evidence of suitability, traceability and regulatory oversight. Implementation of the proposed Scheme should be accompanied by continued strengthening of the broader building product assurance framework.
- **Traceability and building information:** The proposed Scheme requires traceability but leaves the technology and method up to individual manufacturers. GBCA does not consider the proposed traceability arrangements to be sufficient.
- **Certification capacity and skills:** Successful implementation depends not only on technical capability but also on a viable commercial market for Certification Bodies and Design Assessment Bodies. GBCA encourages appropriate testing of certification capacity before implementation of the Scheme.
- **Trade licensing and workforce competency:** GBCA notes that it will be important to ensure the proposed Scheme integrates effectively with existing licensing arrangements without creating unnecessary duplication.
- **Sustainability and circularity:** It is vital that this Scheme is designed to support the transition to a more sustainable and circular built environment. Consistent information requirements relating

to material provenance, embodied carbon, durability, repair and maintenance, disassembly and reuse, and end-of-life pathways should be built into the Scheme from the outset.

GBCA provides further comments on these points outlined above and in relation to several questions provided in the consultation paper below. We have encouraged GBCA member organisations operating in relevant parts of the construction sector to consider providing feedback directly to this consultation as well.

We would also like to highlight a project currently underway by the Sustainable Built Environment National Research Centre (SBEnc), [2.11.5 Sustainable Procurement for Modern Methods of Construction](#). I Chair the Project Steering Group which has also led several other related research projects:

- [P2.10.5 Procuring Buildings and Infrastructure: Unlocking the value of ESG](#) (2024-2026)
- [P2.96 Achieving decarbonisation by reducing embodied carbon through procurement](#) (2023-2024)
- [P2.86 Developing Sustainable and Resilient Supply Chains](#) (2021-2023)
- [P2.76 Sustainable Procurement](#) (2020-2021)

The Sustainable Procurement for Modern Methods of Construction project examines how sustainable procurement and stronger market signals can enable the wider adoption and scaling of MMC in Australia. It focuses on three interrelated areas: procurement-led enablers, non-price value assessment, and workforce transition. The research will identify procurement strategies that reduce risk and support MMC uptake, develop robust non-price criteria and measurable indicators, and examine how demand continuity can underpin workforce transition and skills development. We would welcome the opportunity to provide further information on the outcomes of this project as it progresses.

Relationship with national building-product assurance reforms

(See also Q.19 - **Do you consider that the content of the Manufacturer Declaration of Conformity, as currently proposed, would provide building surveyors or the appropriate authority with sufficient confidence and assurance to rely on when making approval decisions?**)

We note that in 2024, Building Ministers requested a nationally consistent product-assurance system followed by ABCB consultation paper in Sept 2024.

The proposed Scheme's long-term effectiveness will depend on continued development of the broader national building product assurance framework, including evidence of suitability, traceability and regulatory oversight.

Implementation of the proposed Scheme should be accompanied by continued strengthening of the broader building product assurance framework. Evidence of Suitability provisions should also be strengthened as a precursor to the Scheme.

There is little detail available on the conditions for being issued a Manufacturer Declaration of Conformity or whether that will be audited. The lack of third-party verification will help to keep approval times and costs down but will need to be managed carefully to ensure conformity. We also note that with the Australian Government's proposed closure of the Climate Active Program, a trusted methodology for voluntary product assurance regarding carbon will be removed from the market.

Traceability and building information

(See also Q. 14 - **Do the proposed traceability requirements provide an appropriate level of assurance and flexibility for manufacturers?**)

The proposed Scheme requires traceability but leaves the technology and method up to individual manufacturers. There is currently no overarching national traceability framework providing consistent information across the building-product supply chain. GBCA does not consider these proposed traceability arrangements to be sufficient.

Effective traceability is fundamental to a range of important outcomes including:

- regulatory and consumer confidence
- identifying and rectifying defects and facilitating product recalls
- demonstrating product provenance and performance
- providing reliable information through design, construction, operation and end of life
- supporting circular economy outcomes, including reuse and recovery of materials.

Allowing traceability methods to be at the discretion of the manufacturer is unlikely to deliver sufficient interoperability that will support regulatory confidence and circular economy outcomes.

We reference GS1 Australia's discussion paper, [What Does Assurance Look Like When the Building Is Made in a Factory?](#) which notes on p.2:

Discretion combined with cost-minimisation predicts fragmentation. The ABCB's commissioned economic analysis assumes manufacturers adopt "the lowest cost solution that satisfies Scheme requirements" (p.82).

No individual manufacturer captures the benefit of being readable by another company's customer. Interoperability is a shared good, and shared goods are not reliably produced by discretion under cost pressure.

We note that traceability methods must be interoperable, technology agnostic and easy to read. Frameworks such as the UN Transparency Protocol (UNTP), Global Trade Item Numbers (GTINs) etc. must be considered as any system implemented needs to be able to collect a range of data inputs. They should also consider alignment with the EU's Ecodesign for Sustainable Products Regulation (ESPR) and support the use of Digital Product Passports as we move towards digitisation of building information and greater transparency.

We also note the importance of considering the Australia Government's [National Framework for Recycled Content Traceability](#) and the National Building Product Coalition's [Traceability and Digitalisation Guide](#).

GBCA advocates for a national, industry-wide traceability framework to bring greater certainty to product conformance by ensuring the appropriate information is available where it is needed in the building design and delivery process.

An industry-wide traceability framework would provide significant benefit should the common data points be agreed and minimum requirements put in place. Other benefits would include:

- Products could be retained in use for longer and there would be greater information collected and accessible regarding how products could be re-deployed or adapted to new uses in the future.
- Safety risks could be better mitigated and product recalls better managed.
- Cost of building and rectification could be managed with greater cost and time efficiencies with better data provision.

Certification capacity and skills

The success of the Scheme will depend on having sufficient appropriately skilled and accredited certifiers and Design Assessment Bodies. A shortage of people with the necessary combination of NCC, certification and manufacturing expertise could become a significant implementation bottleneck. This needs to be considered in both Scheme design and the proposed implementation timetable.

Successful implementation depends not only on technical capability but also on a viable commercial market for Certification Bodies and Design Assessment Bodies. The Scheme needs sufficient demand and appropriate pricing to attract and retain competent assessment bodies over the long term.

We encourage the ABCB to demonstrate how certification capacity will be developed and tested before widespread implementation, including through the proposed pilot phase.

Trade licensing and workforce competency

The Scheme proposes to retain existing state and territory practitioner licensing arrangements, and the ABCB seeks feedback on whether alternative approaches may be appropriate for factory-based manufacturing, robotics and overseas manufacturers.

GBCA notes that the immediate priority should be ensuring the proposed Scheme integrates effectively with existing licensing arrangements without creating unnecessary duplication.

Sustainability and circularity

The proposed Scheme provides an opportunity to embed better information and assurance practices that support the transition to a more sustainable and circular built environment.

It is vital that this Scheme is designed to support the transition to a more sustainable and circular built environment. Consistent information requirements relating to material provenance, embodied carbon, durability, repair and maintenance, disassembly and reuse, and end-of-life pathways should be built into the Scheme from the outset.

We note our comments above regarding the value of a national, industry-wide traceability framework. Over the past several years, GBCA has been working with industry to develop a [Responsible Products Framework](#). This is partly to define how product and material choices can be recognised within the Green Star rating system, but also to drive industry-wide understanding, supply, and demand for, responsible products. Part of GBCA's vision is to contribute towards supply chain transformation that delivers better outcomes for a circular, decarbonised economy and better outcomes for nature.

The Responsible Products Framework incorporates several elements including:

- [Responsible Products Guidelines](#) - Sets out the criteria for all product certification schemes or similar initiatives (together referred to as 'initiatives') to be assessed against if they wish to be recognised by Green Star.
- Guidance on Responsible Products credits - The Responsible Products credits in Green Star award points for the use of products and materials that are certified by recognised initiatives.

- Responsible Products Value (RPV) - Initiatives are required to demonstrate compliance with the minimum expectations and a selection of the technical criteria. Once these have been met, an initiative will be recognised, and an RPV will be awarded. GBCA assigns RPVs to initiatives and these are passed onto the products they recognise. A [Responsible Products Score Checker](#) is available on the GBCA website. Importantly, a new version will shortly be released which will enhance the ability for users to see how certification is awarded in the Program and provide greater transparency for environmental performance in the supply chain. As noted above, GBCA is concerned that the proposed closure of the Climate Active Program removes an important method of voluntary assurance for products from the market.
- Responsible Products Calculator - The Responsible Products calculator will allow a project team with a registered Green Star project to submit for the responsible products credits.
- Responsible Products database - The Responsible Products database is an aggregated list of products provided by multiple initiatives; it is the dataset supporting the Responsible Products calculator. GBCA account holders can access the Responsible Products database through the creation of a project in the Green Star portal.

We also note that traceability is a core part of similar work underway overseas. A lack of robust traceability and material information embedded in modern methods of construction in Australia may inhibit our ability to export to other markets.

GBCA is part of an [international partnership](#) which includes the Building Research Establishment (BRE), mindful MATERIALS, International Living Future Institute (ILFI), International WELL Building Institute (IWBI) and U.S. Green Building Council (USGBC) who will work together to create a shared approach to materials assessment in BREEAM, Green Star, LEED, Living Building Challenge and WELL. The aim is to adopt a common language, align data and metrics, and establish global targets for climate, nature and circularity.

Once these objectives are achieved:

- Manufacturers will be able to prioritise sustainable products and report data in a more streamlined way.
- Specifiers will have clearer access to verified claims and be better able to compare product information.
- Building owners will be better placed to meet sustainability commitments and future-proof their assets by aligning with global standards.

To arrange further discussion, or for additional clarification of the points made above, please do not hesitate to contact Katy Dean, Senior Policy Adviser, via email at katy.dean@gbca.org.au.

Yours sincerely



Davina Rooney
Chief Executive
Green Building Council of Australia

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 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.