Green Building Council Australia

Building a sustainable future

29 August 2025

Modern Methods of Construction Team
Australian Building Codes Board
The Treasury
Australian Government

Via email: prefab@abcb.gov.au

Dear Modern Methods of Construction Team

RE: A National Voluntary Certification Scheme for Manufacturers of Modern Methods of Construction

The Green Building Council of Australia (GBCA) welcomes the opportunity to provide comment on the National Voluntary Certification Scheme for Manufacturers of Modern Methods of Construction (the Scheme). Modern methods of construction provide significant opportunities to accelerate innovation and improve productivity in the construction industry. With the right settings, there is also huge potential for modern methods of construction to contribute to improved sustainability and circularity in the built environment.

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.

GBCA provides comment in response to the following consultation questions:

19. What are the barriers and opportunities for the Scheme to support:
a) design for disassembly?

Design for disassembly needs to be well defined so there is clear understanding about how which elements need to be disassembled and to what extent. For example, it should be clear if expectations are that modules can be demounted, or that the wet areas can be replaced, or that flooring can be removed or replaced. Another consideration is defining assembly technologies, so that disassembly elements are not glued, welded or riveted.

It is critical that disassembly is documented and maintained digitally so that the relevant user has the information available when needed.

The Scheme should ensure opportunities to digitise this information in line with the United Nations Transparency Protocol (UNTP), or Digital Product Passports (DPPs) as they emerge. At this stage, GBCA

recommends that until standards have been developed and adopted for DPPs, they should not be a requirement of the Scheme, but rather that agreed data points are provided in line with Standards Australia's Universal Data Protocol (UDP).

b) the circular economy, in particular the reuse and recycling of materials?

Significant opportunities exist in design for reuse if units are designed with modularity or for disassembly. The materials and processes themselves must follow the principles of a circular economy, i.e., reduce waste and pollution, be designed to stay in use for longer at highest best value, and seek to regenerate nature. For reuse and recycling particularly, digitisation of the information should be aligned with The National Framework for Recycled Content Traceability. Products and materials should be non-toxic and third party verified to ensure success.

20. How could a traceability framework support the circular economy?

A traceability framework supports the circular economy by ensuring that important information on products and materials is collected and maintained throughout the lifecycle of a product. Traceability is vital to the success of the circular economy.

21. What traceability solutions might be used for the Scheme? Please explain your choice.

Any solution must be interoperable, technology agnostic and easy to read. Frameworks such as UNTP, UDP, Global Trade Item Numbers (GTINs) etc. must be considered as any system implemented needs to be able to collect a range of data inputs.

22. What are the benefits and barriers to a traceability framework being incorporated in the Scheme? Please explain your answer.

A traceability framework is not yet agreed. However, GBCA notes the importance of considering the National Framework for Recycled Content Traceability, UNTP and UDP in particular. With a robust traceability framework, the Scheme would deliver outcomes beyond functionality of the pre-fabricated products.

A national, industry-wide traceability framework will bring greater certainty to product conformance by ensuring the appropriate information is available where it is needed in the building design and delivery process. 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 also be better mitigated and product recalls better managed.

Over the past several years, GBCA has been working with industry to develop a Responsible Products program. 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 of – 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.

More information about our Responsible Products program is available on the GBCA website. It incorporates several elements including:

- 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.

- 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.
- Recognising responsibility products within Green Star - 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.
- 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. Please note that the calculator is currently in beta version.

GBCA notes the National Building Product Coalition (NBPC), an industry alliance committed to strengthening the system of building product assurance within the Australian construction sector. The NBPC has developed a guide for digital traceability[1] which identifies the importance of systems that provide unambiguous information regarding the identity, origin, transformation, location and attributes of building products. Modern methods of construction products lend themselves well to digital traceability with the production run predictability in the manufacturing process.

GBCA encourages the Modern Methods of Construction Team to also consider the submission that the NBPC will provide to this consultation.

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

[1] Traceability and Digitalisation of Building Product Information: Implementation Guide for the Australian Construction Industry