

June 7, 2023

The Honourable Paul Scully MP
NSW Minister for Planning and Public Spaces
GPO Box 5341
SYDNEY NSW 2001

Dear Minister Scully MP

RE: REQUEST FOR AN URGENT MEETING TO DISCUSS AND RESOLVE POLICY CONFLICTS BETWEEN NABERS AND BASIX WITH REGARDS TO EMBODIED CARBON MEASUREMENT OF BUILDING PRODUCTS

I am writing to you on behalf of the *Building Products Industry Council (BPIC)*. BPIC represents the interests of building and construction product suppliers across Australia (building product suppliers directly employ 243,300 people and a further 796,500 indirectly [August 2020]) as well as the 262,000 firms that make up our sector.

As you may be aware, both NABERS and BASIX are independently developing building product embodied emissions tools for their respective sustainability rating schemes.

NABERS has conducted a thorough public consultation and settled on the use of Process-Based Lifecycle Assessment (LCA)/Environment Product Declaration (EPD) tool that is widely used and aligned with international standards. On the other hand, BASIX has conducted limited consultation, has not listened, and is planning to introduce an Input-Output (I-O) Hybrid tool that doesn't comply with international standards and is incompatible with the data developed by the building industry.

It's important to note that BASIX applies at the development application stage, while NABERS requires information at the detailed design stage. BASIX sets a minimum standard for all residential developments, while NABERS is mandatory for new buildings over 1,000 square meters including multi-residential buildings. Given the interconnected nature of these two schemes, their embodied carbon measurement methodologies should be aligned.

In our opinion the BASIX Materials Index should not be released until it is in lock-step with the NABERS approach since having two different embodied carbon measurement schemes operating on the same projects will lead to:

- User confusion and sending the wrong message to the industry.
- Disadvantage for products that have high initial embodied energy but long-term benefits.
- Potentially misleading design practitioners in their selection of building materials.
- Generating incompatible construction carbon abatement reporting for the NSW Government.
- A negative impact on investment decisions especially those related to apartment buildings.

The Board of BPIC thanks you for your consideration and we look forward to your urgent response.

Yours sincerely,



Rodger Hills
BPIC – Executive Officer