

The Version 2.2 Design and As Built Technical Manual – Change Summary (October 2025)



Introduction

The IS v2.2 Design and As Built Technical Manual has been delivered through a structured workplan effectively balancing time efficiency, stakeholder consultation and product quality. This version is an iterative improvement from IS v2.1 Design and As Built Technical Manual, reflecting a more refined and responsive approach to infrastructure sustainability assessment. A high-level overview of the changes to the Rating Tool has been provided below.

Note that this summary is not exhaustive. For further information and detail, please see the v2.2 Design and As Built Rating Tool.

Following the publication of the 'On Display' version of the IS v2.2 Design and As Built Technical Manual (August 2025), the ISC provided the opportunity for industry to submit further feedback and suggestions for refinement. This document has been updated to incorporate the additional feedback and ISC's responses in blue font.

Background

The development of the IS v2.2 Design and As Built rating tool aimed to identify and address core concerns, and guide the evolution of the scheme in a way that enhances usability, relevance, and impact.

To ensure the Design & As Built Rating Tool continues to meet industry needs and expectations, the ISC conducted a comprehensive review of stakeholder feedback from a wide range of sources to identify and understand the core concerns associated with the IS Rating Scheme.

The sources reviewed in detail included:

- Verification Workplans (2020 and 2022) outcomes review
- Continuous Improvement (CI) Register review
- IS Essentials Pilot Process feedback
- September 2023 ISC Verifier Communique
- September 2024 IS PM Questionnaire
- ISC Technical Working Groups feedback
- Engagement with other Rating Standards
- Feedback discussions and workshops with Delivery Authorities such as NZTA, MRPV, MRWA, TMR, WaterCorp, NELP, SRLA and more
- April 2024 Verifier Feedback Workshop
- August 2024 ISC Stakeholder Survey
- March 2023 TfNSW v2.1 Detailed Review Workshop
- Numerous instances of informal feedback (emails, meetings etc).

From the above-mentioned, the ISC articulated the Core Concerns associated with our rating tool offerings as the following (note that Verification was considered and addressed separately):

Relevant Parties	Core Concern Tabled for Consideration
Verifiers, ISC and Tool Users agree that....	<ul style="list-style-type: none"> ▪ <i>“It is <u>costly</u> for all parties involved to deliver an IS v2.1 Rating.”</i> ▪ <i>“The IS v2.1 Rating Scheme is often <u>process oriented</u> and this can be disproportionate to the outcomes driven.”</i> ▪ <i>“The IS v2.1 Rating Scheme is a step change, introducing new <u>complexities</u> that users, verifiers and ISC staff are not familiar with.”</i> ▪ <i>“The Verification process, and subsequently verification results, are negatively impacted by the design of IS v2.1.”</i> ▪ <i>“The <u>extensive timeframes</u> for verification of the IS v2.1 tools negatively impacts project timelines.”</i>
Verifiers and Tool Users believe that...	<ul style="list-style-type: none"> ▪ <i>“The IS v2.1 Rating Scheme is inflexible and <u>does not scale</u> effectively.”</i>
The ISC believe that...	<ul style="list-style-type: none"> ▪ <i>“The rating tools must <u>maintain a level of rigour</u> and legitimate process to ensure projects can be fairly benchmarked.”</i> ▪ <i>“Project teams and Delivery Authorities play a pivotal role in the successful deployment of a rating.”</i>

The ISC proposed to deliver several measures to address the above-mentioned core concerns. The scope of this document focusses solely on the improvements made to the ISv2.1 Design and As Built Rating Tool.

Stakeholder Engagement and Involvement

The ISC’s approach to Stakeholder Engagement and Involvement through the v2.1 Workplan has been well considered and thorough. Since **January 15th, 2025**, the ISC has provided updates every **2–3 weeks** to project teams, delivery authorities and verifiers. These updates were distributed via ISC’s mailing lists and were published on [ISC’s website](#).

Each update included details of the proposed measures, key milestones, links to relevant material, information on current participants as well as guidance on how interested parties could get involved and provide feedback.

A public webinar was conducted on the 7th of March 2025, outlining the core concerns identified as detailed above, as well as ISC's proposed measures to respond to these. Post webinar, surveys were issued to attendees which demonstrated a 100% support rate for the proposed measures relating to the Technical Manual improvements.

Through the development and delivery phase, the ISC utilised the IS Technical Working Groups (TWGs) for in-depth input. Members from the IS Planning, Essentials, Operations, Design and As Built, Proponent and Sustainable Materials TWGs contributed to shaping proposed approaches and reviewed draft content, including several updated credits. Information on these TWG members as well as the organisations they represent can be found on ISC's website [here](#).

In addition, ISC engaged directly with registered IS v2.1 projects to gather insights from active tool users. Participation varied, ranging from reviewing and providing feedback on our proposed measures, to drafting and proposing complete credits themselves for ISC to consider.

Representatives from approximately 25 IS v2.1 projects have been involved. This includes Designers, Contractors, Consultants and Delivery Authorities.

Results and how these improve upon the Core Concerns

The following metrics can be used as high-level indicators to demonstrate measurable enhancement in reducing the complexity, improving efficiency and increasing cost effectiveness of applying the IS v2.2 Rating Tool:

- 109 '**must**' statements removed, resulting in a 9.5% overall reduction
- 53 Credit Criteria removed, resulting in a 10% overall reduction
- 3 '**must**' statements elevated to higher level.
- 3 Credit Criteria elevated to higher level.
- 5 Credit Criteria made optional, promoting best practice whilst allowing greater flexibility.

Note – The metrics were not revised after the on-display period to incorporate all additional improvements made in response to feedback.

Some of the key improvements made across the Technical Manual are as follows:

- Significant improvements to the Environmental Impacts (Env) and Ecology (Eco) categories have substantially reduced overlap with regulatory compliance and vastly improved the focus on measuring outcomes.
- The Sustainability Risk and Opportunity credit (Lea-2) has been modified to better align terminology with ISO 31000 and improve flexibility to fit existing project systems.
- The Sustainable Workforce category (Wfs-1 to 4) has received numerous improvements to improve ease of use and improve flexibility for different project delivery models.
- The Sustainable Procurement Strategy credit (Spr-1) has been updated to improve clarity and simplify terminology.

- Guidance updated across the Technical Manual to include all previous IS v2.1 rulings.

Response to Stakeholder feedback:

To ensure the IS v2.2 Rating Tool reflects real-world needs and priorities, ISC distributed a survey to existing IS v2.1 projects, inviting suggestions for credit improvement and recommendations.

- 74% of the suggestions raised through this survey were either fully addressed, or partially addressed and incorporated into the updated Technical Manual. The remaining 26% have been added to the CI Register for heat mapping and further consideration in the future.

Accompanying Improvements

The IS v2.2 Design and As Built Technical Manual will be complemented by a raft of other improvements being delivered through the ISC's Verification and IS v2.1 Workplans. Collectively, these changes have been carefully considered and are expected to significantly improve the effectiveness and usability of the IS Rating Tool. These include:

- The new Verification Procedure – Ensuring the quality and timeliness of Verifications.
- The new Base Case Proposal and Materiality Assessment Review and Agreement Procedure – Improving the timeliness and quality of reviews.
- Updated Base Case Proposal form – Improving the efficiency and reduce complexity in the Base Case Proposal process.
- The provision of additional supporting material for projects and assessors such as high quality completed example Credit Summary Forms and guidance notes.
- Screening Process for IS v2.1/v2.2 projects between the values of \$100m and \$500m – Improving the flexibility and scalability of the tool.
- Improved communications from ISC regarding the purpose and benefits of the Rating Scheme and Verification
- Reduced format Technical Manual to support clearer communications related to the rating process for tool users

Note – Feedback has been generalised where multiple comments regarding the same topic have been received.

Pla-2 Urban and Landscape Design

The requirement to deliver an Urban and Landscape Design Plan as well as an Urban and Landscape Design Statement increases administrative burden for no material gain in outcome.

Positive feedback: The removal of the urban design landscape statement has improved the time and cost effectiveness of this credit.

It is recommended that the Design Review report template referred to in Notes is uploaded to the ISAP Resources website.

Measuring user satisfaction immediately post-construction does not allow for establishment and limits assessor confidence in achievement of the credit.

What evidence is expected to substantiate a reduction in urban heat island effect

The useful references section contains several outdated TfNSW documents.

The definition of 'landscape productivity' is vague and not supported by references or examples.

It is suggested that the evidence to demonstrate alignment with the

Updated

- ISC to upload Design Review Template to ISAP Resources with all other v2.2 collateral.
- References provided to external documentation.
- Definition of landscape productivity to provide further clarification whilst simultaneously ensuring it remains flexible enough to reward projects wherever possible.

Removed

- Criterion “DL2.1 An urban and landscape design statement has been prepared” has been removed.
- Criterion ‘ABL3.1 A user evaluation has been undertaken and confirms that at least 75% of users are satisfied the quality of place has improved’.

Clarification

- The use of an SQP is incorporated into the criteria for heat island effects. Consequently, the ISC has not prescribed evidence requirements, deferring instead to SQP’s judgement. If the SQP has concerns about meeting the criteria, a TC or CIR may be submitted, which could inform subsequent improvements to the scheme.
- Currently, requirements do not specify where alignment with design review principles must be documented, allowing flexibility for differing project approaches. If projects have concerns with their given approach or any provided Verification feedback please consult with your IS Project Manager or consider submitting a Technical Clarification.

	principles of design review can come from multiple sources.	
Lea-1 Integrating Sustainability	<p>The credit includes notes on establishment period requirements, but it's unclear whether the related Must Statements are mandatory for earning any points in Lea-1.</p> <p>Requirements for handover documentation, public reporting, and SDG alignment may add complexity and resource needs.</p>	<p>Updated</p> <ul style="list-style-type: none"> Credit criteria to include previous v2.1 rulings regarding establishment period requirements to improve flexibility for projects. Credit language to align with changes in Verification Procedure, specifically, the inclusion of ISC Review and Agreement of the Materiality Assessment. Where possible, Must Statements have been removed from the Notes section and integrated directly into the relevant criteria. <p>CI Register</p> <ul style="list-style-type: none"> Feedback on handover documentation, public reporting, and SDG alignment to our CI register for heat mapping and future consideration.
Lea-2 Risks Management (Threats and Opportunities)	<p>Feedback highlighted the overlap and duplication of requirements with fundamental, robust contractual or standard risk and opportunity (R&O) management processes on projects.</p> <p>Additionally, the scope and boundary of this credit has been found to encroach on the requirements of other credits addressing the impacts of identified risks and opportunities across the tool.</p> <p>Positive feedback: The credit significantly improves clarity and removes several 'MUST' statements that, while not difficult, added unnecessary administrative burden to CSFs and evidence gathering.</p> <p>The credit notes specify that “threats and opportunities” relate only to sustainability risks, but D/ABL1.1 suggests the risk framework applies project wide.</p>	<p>Updated</p> <ul style="list-style-type: none"> The credit name was modified to clearly articulate the credit’s scope – management of sustainability risk. Definition of risk has been modified to align with ISO 31000. The focus of the credit focussed to integrate sustainability considerations into the risk and opportunity management process in two key ways: <ol style="list-style-type: none"> Sustainability risks and opportunities to be assessed utilising the same standard project risk management approach applied across all other project business units. Projects aiming for higher level of performance to incorporate sustainability aspects in their consequence criteria for assessing negative risks (threats). D/ABL1.1 to allow flexibility in instances where project terminology or risk classification does not align with that used by the Technical Manual. The credit notes section to provide an overview of the intended function and scope of the Lea-2 credit for clarity, including which types of risks are considered under which levels. D/ABL2.1 to explain that this requirement builds on the D/ABL1.1 framework by ensuring that all project risks are also assessed against sustainability consequence criteria. D/ABL1.3 to provide flexibility for instances where untreatable risks (threats or opportunities) may exist (i.e. Where project budgets prevent all opportunities from being realised). <p>Combined</p> <ul style="list-style-type: none"> Design and As Built criteria merged to significantly decrease the number of requirements and ‘must’ statements.

Minor editorial issues v2.2. 'TM on Display'

Clarification sought as Level 1 suggests the same process applies to both threats and opportunities, but Level 2 applies sustainability criteria only to threats.

Additional guidance on selecting a suitable risk rating matrix would be helpful. D/ABL1.3 currently implies that 'extreme, very high, and high' ratings are mandatory under D/ABL1.1.

Reduced

- Scope and boundary narrowed to focus on a robust risk identification and management, with most evidence requirements limited to risk registers only.
- Personnel requirements for ongoing updates and management of identified risks have also been reduced for Level 1.

Removed

- Separate references to risk and opportunity in accordance with ISO definition.

Note: Projects are strongly encouraged to review updates to this credit in detail. Due to the extent of changes, not all modifications can be succinctly captured here.

CI Register

- The term 'threats and opportunities' in the credit may be misinterpreted as referring to positive and negative mitigations, rather than its intended ISO risk definition. This item has been added to the CI Register for heatmapping and future consideration.

Lea-3 Knowledge Sharing

Positive feedback: Making design Level 3 evidence achievable within the design timeframe is a welcome improvement.

Updated

- Reference to ISC's Impact Report with minor editorial adjustments for clarity.
- Credit criteria revised to incorporate Ruling Lea-3.02, ensuring consistency.

Spr-1 Sustainable Procurement Strategy

The use of the term 'material', and suggested process for identifying risks in the project's supply chain is ambiguous. While a risk assessment is suggested within the must statements of D/ABL 1.1, it is not clear which outputs from this are and are not material.

The use of the term 'material' is rigid impacting its applicability to all procurement types.

The requirements for various personnel to be involved in the risk identification and management process vary across Level 1 criteria.

Updated

- Risk-related language aligned with ISO 31000 terminology and Lea-2 credit.
- Multidisciplinary team requirements simplified to ensure consistency of required personnel across Level 1.

Revised

- The language and extent of D/ABL1.1 to provide clearer requirements and remove ambiguity. The use of the term '*material sustainability risks and opportunities*' has been replaced with '*high and above sustainability risks (threats and opportunities)*' to better clarify the scope of the credit.
- Guidance and requirements around which subcontractors and suppliers must be considered and addressed within the Spr category. This guidance has retained and further clarified the level of flexibility available to projects through updates to D/ABL1.3, where projects can justify any high and above sustainability risks not being addressed.
- Level 1 structure re-aligned with Lea-2 to support projects targeting both credits.

Reduced:

Positive feedback: The added clarity on applicable procurement packages for the Spr credits is a welcome change.

Positive feedback: The updated multidisciplinary team definition in v2.2 improves efficiency by streamlining representation. Shifting the extended supply chain assessment to Level 2 also makes Level 1 more accessible.

Alignment with Lea-2 language is helpful, however, a separate risk assessment framework is still required to be built to align with the impact areas, which is arduous and involves holding two separate registers.

- Scope and boundary of the credit narrowed to primarily focus on a robust risk identification and management process, limiting most evidence requirements to updates being provided in risk registers only.

Moved

- Assessment of extended supply chains from Level 1 to Level 2, improving accessibility of Level 1.

CI Register

- Managing risks in the extended supply chain may be challenging, as suppliers often do not assess sustainability risks until after contracts are signed, limiting opportunities to incorporate treatment options. This item has been added to the CI Register for heatmapping and future consideration.

Clarification

- If the Lea-2 risk assessment includes supply chain risks and complies with Spr-1 requirements, a separate risk assessment is not required. Refer to D/ABI1.2.

Spr-2 Supplier Assessment and Selection

Typical contract mechanisms do not allow for sharing of feedback to suppliers

Other feedback received for this credit has been included under Spr-1, as it is primarily relevant to the scope of suppliers and subcontractors that this credit applies to (these are identified in Spr-1).

Positive feedback: Removing the requirement to inform unsuccessful suppliers. The added clarity on applicable procurement packages for the Spr credits was also well received.

Updated

- Risk-related language aligned with ISO 31000 terminology and revised Lea-2 credit.

Revised

- Credit language and scope adjusted to reflect the changes made in Spr-1, particularly regarding relevant risks and flexibility in addressing them.

Removed

- Criterion: “*unsuccessful suppliers are informed of how they performed in terms of sustainability.*”

Clarification

- Procurement initiated during the tender phase for use in design and construction must meet Spr credit requirements. If goods or services are already fully procured during the tender phase – which is unlikely – the requirements do not apply.

Based on the credit notes, it's unclear whether procurement during the tender phase must comply with Spr credit requirements.

Spr-3 Contract and Supplier Management

Positive feedback: Including optional criterion is a positive impact.

Request ISC provide an example showing how points are awarded when the criterion is or isn't targeted.

Updated

- Risk-related language aligned with ISO 31000 terminology and revised Lea-2 credit.

Revised

- Credit language and scope aligned with the changes made in Spr-1 around relevant risks and flexibility in addressing said risks.

Updated

- Level 2 criterion requiring proactive management of non-compliant subcontractors and suppliers. This has been made optional to improve credit flexibility. 50% of Level 2 points have been designated to this criterion.
- [Included a worked example for the non-compulsory D/ABL2.2 criterion.](#)

Res-1 Climate and Natural Hazards Risks

Climate and natural hazards report required adding unnecessary administration burden. The requirement to consider multiple RCP pathways and multiple time frames is bloating the already large risk assessments.

The requirement to have "affected and interested community groups" to be consulted as a must requirement, is impractical as the community aren't the SQP's or technical experts required to judge appropriate treatments.

Verification should be focused on meeting the credit requirements rather than the opinion of the verifier on how the evidence has been developed. The benefit of the doubt must be given that the evidence has been delivered to an acceptable standard by the SME/SQP

Updated

- Credit guidance now incorporates ruling Res-1.01 regarding SSP climate scenarios, for improved alignment with current climate risk modelling practices.
- Language and reference updated to include Ecn-1 for significant decisions, ensuring consistency across credits.
- [Credit guidance in response to further concerns regarding external stakeholder engagement in Level 2 there has been an additional 'justification' pathway introduced to DL2.4. This allows the exclusion of feedback where it is not materially relevant.](#)
- [Credit guidance to include a definition to 'Viable' in the Technical Manual under DL1.2.](#)
- [Language regarding MCA process to improve consistency across all applicable credits.](#)

Removed

- The term "Feasible" has been removed from Level 1 to avoid confusion and conflict with the formal options assessment required at Level 3.

Feedback not addressed

- ISC's guidance pertaining to climate change risk assessments maintains alignment with Australian Standard AS 5334 (along with several other industry standards), which includes the recommendation to undertake sensitivity testing.
- As a key theme throughout the Technical Manual, it is the responsibility of those affecting others, to be transparent regarding the proposed impacts and mitigations. Note that for both the Level 1 multidisciplinary team and Level 2 affected stakeholders, it is not intended that each person is a technical expert as thorough

	<p>Further clarification sought on the definition of 'Viable' in Level 1 and 2.</p> <p>Clarification of, and potential definition for 'Asset Context' used in previous version of the summary of feedback when referencing AS5334.</p>	<p>understanding of asset context is also necessary to be able to undertake an effective climate change risk assessment (as outlined in AS 5334).</p> <ul style="list-style-type: none"> ○ It is acknowledged that the text above conflates two separate items, which may cause confusion. It was not intended to suggest the AS5334 explicitly mentions 'Asset Context'. The note was intended to clarify that not all people in the engagement process are required to be climate change risk professionals, rather, they include representatives from a broad range of disciplines (included in the diagram on pdf pg. 7 of the AS5334). ○ As such there will be no definition provided for 'Asset Context'. <ul style="list-style-type: none"> ● Feedback regarding the focus of verification has not specifically been addressed in this Technical Manual update. However, the revised Verification Procedure aims to more consistently apply the Verification Principles that reflect this sentiment.
Res-2 Resilience Planning	<p>This credit has prescriptive terminology which is not reflected in industry or in stakeholder engagement.</p> <p>The shocks and stressors in table G21 are very broad, making it difficult to understand applicability and relevance to an infrastructure project.</p> <p>Issues with changes to multidisciplinary team involvement when reviewing the resilience plan in DL1.4.</p> <p>Concerned that this credit does not allow flexibility for projects that do not conclude with a complete and functional asset.</p>	<p>Updated</p> <ul style="list-style-type: none"> ● Level 1 guidance enhanced to better consider relevant sources of shocks and stresses. ● Table G21 updated to be clearer and slightly reduced improving useability. ● Guidance to include a pathway by which projects that rely on the delivery of multiple projects in order to provide and operating/functional asset can scope out the credit. <p>Revised</p> <ul style="list-style-type: none"> ● Level 1 requirement to include 'must' statement. i.e. <i>Resilience Plan must be reviewed by a multidisciplinary team.</i> <ul style="list-style-type: none"> ○ Removed this 'must' statement in the revision. <p>Moved</p> <ul style="list-style-type: none"> ● External stakeholder engagement for identifying key interdependent physical assets and services moved to Level 2, improving accessibility of Level 1. ● Treatment options to address impacts to identified vulnerable communities to Level 3 to improve accessibility of Level 2.
Inn-1 Innovation	N/A	No changes have been made to this credit at this stage.
Ecn-1 Options Assessment and Significant Decisions	<p>The requirements for significance thresholds are not clear and have led to different interpretations.</p> <p>\$2 million cost significance threshold</p>	<p>Created</p> <ul style="list-style-type: none"> ● A dedicated credit guideline has been developed to clarify the Cost Benefit Analysis process. This includes worked examples and terminology aligned with that of Infrastructure Australia's guidance. <p>Updated</p>

results in a substantial amount of admin burden for large projects.

Positive feedback: Revised CAPEX bands for significant decisions is a great outcome.

Further justification required for the determination of the multiple thresholds for projects of different Capex bands.

The non-significant decision pathway and how it relates to Ecn-1 generally is very confusing.

The inclusion of externalities for Level 3 is confusing and overly complicated.

More guidance is required on what is required for this credit as project approaches vary greatly. Specifically, whole of life costing expectations are unclear.

Positive feedback: The provision of a guidelines for the assessment of external impacts and accompanying examples is a strong improvement.

Amending the percentage of significant project initiatives applying the options assessment process to 25%, 50% and 75%.

More guidance was sought on the significance thresholds triggers,

- Notes section to include other credits where Ecn-1 is applicable.
- Language utilised in D/ABL1.1 improved to clarify threshold setting requirements.
 - Further updated to clarify number of significance thresholds to be classified as significant.
- Financial threshold requirements scaled to better reflect project size, reducing administrative burden on larger scale projects.
 - The capex thresholds in Ecn-1 were introduced to better reflect the scale of larger infrastructure projects and ensure that significant decisions are assessed proportionately. Capital expenditure has long been used as a proxy for project scale within ISC's framework, and the thresholds were scaled accordingly to avoid overburdening large projects with excessive reporting on lower-value decisions. This item has been added as a continuous improvement item to be monitored following projects applying the new thresholds.
- The sign off significance thresholds from 'Project Director or Project Manager' to 'Member of the Senior Management Team', improving flexibility.
- MCA and Whole of Life Costing examples included in the Additional Guidance for improved clarity.
- Updated language to confirm that a decision only has to cross one (at a minimum) trigger to be determined as significant.
- Updated terminology from 'Social Cost of Carbon' to 'Value of Carbon'.

Revised

- Terminology around externalities replaced with 'external impacts' instead, aligning with industry language and Infrastructure Australia's CBA guidance.
- Accompanying Level 3 external impact guidance to improve clarity and useability.
 - Revised must statement to make clear that for external impacts not readily monetisable, a supporting qualitative or quantitative assessment must be included and overlaid on the CBA results to ensure the full range of impacts is considered in decision-making.

Removed

- 'Must' statement regarding the applicable range of options in D/ABL1.2. This has been incorporated as Additional Guidance instead to improve accessibility of Level 1.

Feedback not addressed

- The percentage of options applying the process is based off best practice and has not been amended.

clarify whether an 'And' or 'Or' requirement.

Clarification sought on external impact assessment in Level 3.

Suggested a change in terminology from 'Social Cost of Carbon' to 'Value of Carbon'

Ene-1 Energy Efficiency and Carbon Reductions

The options assessment and/or implementing all feasible options is acting as a barrier to rewarding outcomes that have been achieved.

Unclear whether certain scope 3 emissions should be counted in Ene-1, in Rso-6 or neither. For example the Ene category definitions section of the Technical Manual indicate that "embodied carbon" is to be counted in the Rso category, but appendix 1 of the IS v2.1 and IS Essentials Energy and Carbon Guideline indicates that GHG emissions associated with potable water supply may be relevant to ene-1.

Positive feedback: Improvements made to the SQP involvement requirements provides a greater level of assurance and confidence for projects.

Positive feedback: Inclusion of optional criteria rewards projects more often.

Created

- Additional note to clarify how the purchase of renewable energy can be applied to Ene-1 and Ene-2.

Updated

- Options Assessment criterion has been made optional to improve credit flexibility and ensure that outcomes are rewarded wherever possible. 10% of the project's targeted level have been designated to this criterion.
 - Added example calculation under D/ABL1.2.
- Language and reference to Ecn-1 for significant decisions.
- Notes section updated to include Ruling Ene-1.10, clarifying treatment of separately purchased renewable energy and associated carbon benefits.
- SQP requirements revised to allow for either a review or model development by an SQP.
- Language regarding MCA process to improve consistency across all applicable credits.

Revised

- Credit language aligned with changes in the Verification Procedure, including the ISC Review and Agreement of the Base Case Proposal.
- As Built criteria order to align with Design phase updates.
- Options assessment criteria to be a singular D/AB criterion to allow for the implementation of the 'optional' component.
- Language and reference to Ecn-1 for significant decisions.
- Credit notes to provide improved guidance for the handling of renewable energy purchases with decoupled carbon benefits.

Feedback not addressed

- Ene-1 guidance regarding the inclusion of material Scope 3's is unchanged at this stage.

Confusion around how the “non-compulsory criterion” are calculated.

Further clarification is sought regarding the handling of decoupled renewable energy generation and carbon benefits across Ene-1 and Ene-2.

Depending on the mechanism through which potable water is prepared and delivered to site, this may present as a material energy consumption. For Rso-6, all Scope 3’s that are intended to be accounted for, are incorporated into the Materials Calculator.

Ene-2 Renewable Energy

It is unclear how projects are expected to account for purchased renewable electricity.

The Technical Manual states that both *"For current electricity sources, the percentage of substitution claimed can only be associated with the electricity in the grid that is non-renewable"* and substitution calculation should use *"Total non-renewable energy substituted by renewable energy (expressed in MJ)"*.

It is unclear how Scope 3 emissions in the Ene-1 model should be accounted for in this calculation (especially since many will be difficult to interpret such as emissions associated with water use).

Advised the LGC scheme is set to end in 2030 and will be replaced by Renewable Electricity Guarantee of Origin certificates (REGO).

Further clarification is sought regarding the handling of decoupled renewable energy generation and

Updated

- Notes sections to include ruling Ene-2.09 regarding the separate purchase of renewable energy and the carbon benefits.
- Updated table En6 to include Renewable Electricity Guarantee of Origin certificates (REGO) alongside LGCs.

Revised

- Credit notes to provide improved guidance for the handling of renewable energy purchases with decoupled carbon benefits.

Feedback not addressed

- The overall calculation method remains unchanged. Feedback received appears to have conflated this with separate guidance provided about the portion of grid energy that can be claimed as substitutable.
- Inclusion of scope 3 emissions as substitutable sources has been retained. Given only relevant scope 3’s are to be included in the Ene-1 model and the involvement of SQPs in identifying these, it would be expected that projects understand these sources to a reasonable extent. It is expected that like many criteria across the Technical Manual, the challenge/need to substitute these will vary appropriately from project to project with different contexts.

carbon benefits across Ene-1 and Ene-2.

Ene-3 Offsetting

With the increasing controversy in the offset market, this credit should be removed or made optional (optional is not necessarily the same as scoping out).

Removal of third-party certification of carbon neutrality in Inn-1.

Updated

- Language used in credit to remove linkages to net zero claims.

Feedback not addressed

- Ene-3 as a whole has been retained. This credit and its scope has intentionally been separated from Ene-1 to avoid introducing inaccuracies and inappropriate claims into the Energy and Carbon model. ISC are aware that there are serious and legitimate concerns surrounding some offsetting practices which need to be rectified. However, simultaneously ISC are aware that the infrastructure sector is reliant on offsetting in order to achieve many carbon and climate targets regionally, nationally and globally. It is ISC's position that we must advocate for better offsetting practices while continuing to support their use. We must account for any inaccuracies and make appropriate claims associated with the impact of their use wherever possible.
- Subsequently, the ISC has acknowledged that it is currently not suitable to be certifying "net zero", "carbon neutral" or similar claims that are reliant on the use of carbon offsets, and so the 'Carbon Neutrality' Innovation Challenge pathway has been removed at this point in time.

Env-1 Receiving Water Quality
Env-2 Noise
Env-3 Vibration
Env-4 Air Quality

The Env category does not align with regulatory process and results in a duplication of effort.

The Env category Level 1 is extremely prescriptive. Project's typically conduct work relevant to these areas as part of early approval processes.

The Env category requires complaints registers be provided to demonstrate that no recurring or significant exceedances of noise goals have occurred.

The availability of suitably qualified professionals to deliver the modelling requirements and SQP reviews

The credits have been responded to collectively as the changes made are largely uniform across each.

Updated

- Language and criteria across all four credits to ensure they are consistent and aligned where appropriate.
- Env-3 to incorporate ruling Env-3.03 regarding dilapidation inspections.
- Level 1 guidance to include a pathway where projects can seek to substantiate that any exceedances (major or reoccurring) incurred have resulted in no significant or permanent environmental damage, and subsequently still achieve the criteria.
- Level 3 guidance to allow the flexibility of using attended or real time monitoring for Env-2 and 4.
- DL 2.1 & ABL 2.1 guidance to improve clarity around how stakeholders need to be engaged and provide flexibility in instances where feedback provided is not practicable.
- Credit notes to reiterate that the use of the term modelling is broad in nature and does not specify computational modelling for all instances. The extent of the modelling and prediction of impacts is dependent on the scale and risk of the given impact, which is justified by the project and their SQP.

required for the Env Category is a significant obstacle. The additional criteria were also not directly proportionate to a positive sustainability outcome.

There is a misalignment between materiality assessment for the Env category and regulatory risk assessment. Moderate impacts are likely to be overstated by the materiality assessment, as it does not account for other factors such as the number of sensitive receptors, dispersion, existing conditions and effectiveness of available controls

Positive feedback: General reduction in admin burden and scale of the credits is very beneficial and appreciated.

Positive feedback: Agree projects should not be rewarded for breaching regulatory compliance as Level 1.

The requirement for no recurring or major exceedances as a Level 1 requirement is incredibly difficult for large projects and disincentivises projects from attempting the Environment category of credits.

(Env-1) It is unclear for Level 3 how the last criterion can ever be possible for a dam project.

- Guidance to include a pathway through which projects that rely on the delivery of multiple projects in order to provide and operating/functional asset can still achieve the credit.

Removed

- Level 1 criteria regarding baselines studies to better allow for credit overlay with regulatory process. These criteria are instead provided as Additional Guidance.
- Level 1 criteria regarding implementation of measures to reduce admin burden. These criteria were found to be rather arbitrary in nature and didn't add significant value, focussing the credits more on assessing outcomes.
- Level 1 criteria regarding monitoring requirements to reduce admin burden and prescriptiveness. The involvement of SQPs and requirement to demonstrate the achievement of objectives and goals as part of the As Built submissions inherently covers this.
- Several SQP requirements as a result of the above, reducing their required scope of works and subsequently level of required involvement. Additional changes to the verification process will further recognise the value of SQPs.

Moved

- Level 2 requirement to demonstrate that objectives and goals will be achieved has been moved to Level 1 (i.e. no net impact).

Note: Projects that previously achieved a Level 2 result under Versions 1.2, 2.0 and 2.1 would most likely still do so under the revised credit.*

For each credit, a singular Level 2 requirement regarding no net impact (for the relevant environmental impact type) has been moved to Level 1. This aligns the credit structure with several others in the v2.2 Technical Manual including Her-1 and Eco-1.

**Given the Level 2 performance benchmarks for Env-1 to 4 have remained largely consistent over IS Versions 1.2, 2.0 and 2.1, ISC were able to conduct analysis across all verified projects to understand whether moving the no net impact criteria to Level 1 poses a significant challenge to projects.*

It was found that across all rated projects, across all manuals, from the years 2017 to 2025, the average targeted score for the Dis/Env-1 to 4 credits was beyond Level 2. Therefore, the decision to move said criteria is not expected to impact the targeted performance level for a majority of projects, while significantly reducing the admin burden associated for Level 1.

Feedback not addressed

- The Env credits do not require complaints registers to be provided, rather this is a suggested evidence type. Outcomes can be demonstrated without the use of a

For operations, the requirement to undertake to review impacts and mitigation measures every 2 years is simply not practicable and does not provide additional value

(Env-2 & 4) Attended monitoring better provides context in terms of the environment and activities being undertaken during the actual monitoring and is preferred.

DL 2.1 & ABL 2.1 and must statements still seem to require individual stakeholder engagement and input into noise controls and mitigation measures

It is only reasonable to carry out modelling on major infrastructure projects if impacts are considered a risk.

Clear clarification is needed to ensure that projects are not inadvertently penalised for not strictly following additional guidance that should be advisory rather than mandatory.

Env-5 Light
Pollution

Road safety requirement make meeting Lux limits challenging.

The credit requests baseline studies but does not then apply or utilise these.

ISC could have set a lux limit at habitable rooms based on the

complaints register. Materiality assessment has not been modified at this stage, however, alternative materialities can and should be proposed where appropriate factors beyond those considered by the materiality assessment influence an impact area's relevance.

CI Register

- Feedback regarding the applicability of the Env-1 credit to a dam project has been added to ISC's CI register for heat mapping future consideration. Projects facing this scenario may proceed through the CIR pathway in the interim.

Clarification

- Stakeholder engagement specified in ABL2.1 to review impacts and mitigation measures applies only through the As Built (construction) phase. It does not require engagement to continue every 2 years through operations.
- In this instance, the additional guidance does not form part of a must statement; it is provided to assist projects seeking further clarification on the topic.

Updated

- Level 1 guidance to include a pathway where projects can seek to substantiate that any exceedances of boundary or sensitive receiver targets incurred have resulted in no significant or permanent environmental damage, and subsequently still achieve the criteria.
- DL1.1 to remove the use of the term audit and replaced with baseline studies.

Feedback not addressed

- Regarding conflicting light spill performance expectations and road safety requirements, this is a context specific issue that ISC does not believe warrants

Environmental Zones of AS/NZS4282 (Table 3.2 only), and review the treatment options with affected stakeholders if they exceeded those thresholds.

If ISC are concerned about lighting impacts to local fauna, then they should have followed the same process as ENV-2 DL3.1

Transport projects cannot compromise essential safety requirements to meet environmental lighting objectives, and it seems inequitable for projects to be disadvantaged in IS ratings.

Performing baseline studies or modelling by an SQP on top of EES/EIS or similar preliminary studies is an addition expense.

Suggest replacing design audit with a lighting review by an SQP.

modification to the current criteria. Safety requirements are being met at the cost of environmental lighting impacts, that projects in other locations or other asset types are able to satisfy.

- Baseline information is used to inform subsequent Level 1 requirements. While there are no must statements around this, it would be assumed appropriate baseline information would be necessary for an SQP to complete modelling exercises understanding project context.

Clarification

- The Env-5 credit criteria aims to address light pollution as well impacts to sensitive receivers simultaneously (see credit intent), hence, impacts are not solely assessed at the point of sensitive receivers.
- ISC have observed that all infrastructure projects face unique contextual challenges (as well as strengths!). The tool is designed to account for these differences through the materiality assessment, ensuring sustainability topics are prioritised appropriately. Creating exceptions or alternative pathways for specific asset types and contexts is not appropriate, as this would undermine the purpose of benchmarking all asset types and contexts against industry-recognised impact and performance benchmarks for each given sustainability topic.
- If a project's EES or EIS has conclusively determined that the upward and horizontal light spill criteria at the boundary of the project will be achieved and there are no impacts to sensitive receivers as a result of the project, the project may consider using a CIR to avoid the duplication of effort.
Note that these documents typically establish baseline conditions in order to assess potential impacts.

Rso-1 Resource Strategy Development

Positive feedback: The updates to applicable capex thresholds for the MCA process are well received.

Requirement for use of MCA needs to be clarified.

Updated

- Language and reference to Ecn-1 for significant decisions
- Language updated to clarify requirement around use of MCA.
- Language regarding MCA process to improve consistency across all applicable credits.

Rso-2 Management of Contaminated Material

SQP requirements for Rso-2 are specific to NSW, causing issues for other states in Australia that do not have equivalent qualification requirements

Updated

- Credit criteria to incorporate Ruling Rso-2.02.
- Language and reference to Ecn-1 for significant decisions.
- Minor editorial issues v2.2. 'TM on Display'.

	<p>Positive feedback: The updates to applicable capex thresholds for the MCA process are well received.</p>	<ul style="list-style-type: none"> Language regarding MCA process to improve consistency across all applicable credits. <p>Feedback not addressed</p> <ul style="list-style-type: none"> The SQP requirements for Rso-2 just defer to the regulatory requirements of the given region, making them as flexible as possible and ensuring that the tool does not duplicate effort or undermine regulatory process. Examples have been provided for New Zealand and NSW to assist only.
Rso-3 Management of Acid Sulfate Soil	N/A	<p>While no direct stakeholder feedback was noted for this credit, updates have been made to improve flexibility in alignment with related credits.</p> <p>Updated</p> <ul style="list-style-type: none"> Credit criteria to incorporate Ruling Rso-3.01. Minor editorial issues v2.2. 'TM on Display'.
Rso-4 Resource Recovery and Management	<p>Inflexibility in awarding outcomes for achieving some, but not all, resource targets.</p> <p>Positive feedback: The flexibility introduced using award per resource output category is very welcome.</p> <p>Suggested MCA process to assess feasible opportunities should be made optional in line with Ene-1 and Wat-1 credits.</p> <p>Allow fractional scoring approach for project defined targets.</p>	<p>Updated</p> <ul style="list-style-type: none"> Language and reference to Ecn-1 for significant decisions. Scoring calculation methodology associated with the achievement of Resource Output Targets to allow more flexibility in rewarding outcomes. Fractional scoring approach for project defined targets added. Language regarding MCA process to improve consistency across all applicable credits. <p>CI Register</p> <ul style="list-style-type: none"> The ISC attempted to incorporate the optional criteria for the MCA process in Level 2, however, the introduced scoring flexibility for diversion from landfill targets, has meant that adding an additional unrelated optional criteria on top of this will result in an unacceptable level of complexity in the scoring and user interpretation of the credit. Further, there is already a reduced difficulty pathway available in Level 1 that doesn't involve an MCA. This item has been added to the CI Register for heatmapping and future consideration.
Rso-5 Adaptability and End of Life	<p>Additional bespoke plan and workshops required adding unnecessary administration burden. Focus on the intent of the credit and encourage projects to consider and implement more adaptability and end-of-life outcomes into the design.</p>	<p>Updated</p> <ul style="list-style-type: none"> Language and reference to Ecn-1 for significant decisions. Language regarding MCA process to improve consistency across all applicable credits. <p>Feedback not addressed</p> <ul style="list-style-type: none"> The ISC have not revised criteria for this credit at this stage. The credit's focus still remains on wholistic adaptation and end of life planning.

Positive feedback: The additional clarity in defining 'significant' based on the cost of the initiative relative to CAPEX.

Rso-6 Material Life Cycle Impact Measurement and Management

The additional guidance in the Technical Manual for bespoke temporary materials for Rso-6 is also unclear about what counts as a "temporary material" a "bespoke temporary material" or neither. For example should projects that use large-scale bespoke equipment such as tunnel boring machines count the lifecycle stage A1-A3 emissions in Rso-6 as if this were a bespoke temporary material? Or would this be a better fit as a relevant scope 3 emission in Ene-1 since it is associated with equipment?

The Level 3 threshold has been increased from v1.2 to 45% while also having shifting business as usual assumptions.

Positive feedback: The updated Engineer of Record definition and alignments with verification procedure are positive changes.

Suggest rewording of the temporary materials guidance. The current wording was seen as potentially misleading due to varying interpretations of "temporary materials."

Suggest ISC consider:

Updated

- SQP definitions to incorporate Ruling Rso-6.03 regarding the definition of an Engineer of Record.

Revised

- Credit language to align with changes in Verification Procedure to include ISC Review and Agreement of the Base Case Proposal.
- [Language and guidance in relation to temporary materials for improved clarity.](#)

Feedback not addressed

- Definitions for Temporary Materials (materials which are only required as part of the construction phase of works and are not required for operation) and Bespoke temporary materials (Temporary structures which cannot feasibly be removed) are included in the additional guidance. Updating guidance to incorporate the handling of a TBM through the Materials Calculator has not been undertaken. Assessors are encouraged to reach out to the ISC or utilise a Technical Clarification for scenarios such as these.
- 45% reduction threshold has been maintained. This was revised for v2.1 based on the consistent increase and trend in targeted and verified levels for Mat-1/Rso-6 between 2017 and 2025. Since 2021, the average targeted score for Mat-1 has been beyond Level 2. The appropriateness of this threshold will continue to be monitored.

CI Register

- [Feedback regarding allocation of points for life cycle modelling without achieving reductions has been added to the CI Register for heatmapping and future consideration.](#)

- 1) Increasing the points achievable for this credit.
- 2) Awarding points for making the model available, even without reductions, for internal or industry benchmarking.
- 3) Exploring alternative mechanisms to encourage life cycle assessment modelling, even if no reductions are achieved

<p>Rso-7 Sustainability Labelled Products and Supply Chains</p>	<p>Positive feedback: Improvements to SSA certification and ISEAL guidance are fully supported.</p> <p>Imported earthen fill material (spoil) should be excluded from Rso-7. Reused/reclaimed materials that have a purchased price, but are not manufactured, with zero EnviroPoints for A1-A3 should be excluded.</p>	<p>Updated</p> <ul style="list-style-type: none"> • Available sustainability labels updated to incorporate Steel Sustainability Australia Certification Program following Ruling Rso-7.01. <p>Revised</p> <ul style="list-style-type: none"> • Criteria language to improve clarity with minor editorial amendments, including clarifying language around ISEAL. <p>CI Register</p> <ul style="list-style-type: none"> • Requests for exclusion from EPD calculations. It is noted that EPDs for quarried materials, including general fill, are currently in use in market. This item has been added to the CI Register for heatmapping and future consideration.
<p>Wat-1 Avoiding Water Use</p>	<p>Positive feedback: The use of the optional criteria provides greater flexibility for projects that opt not to follow this path without forfeiting entire credit</p> <p>It is unclear why 10% of the credit, which is driven by reductions against the base case (i.e., the actual outcomes/ intent of the credit) is penalised through this action (not undertaking an MCA). If it is not important, it should be removed altogether.</p> <p>Quantities are not captured in the base case proposal form - suggest</p>	<p>Updated</p> <ul style="list-style-type: none"> • Options Assessment criterion made optional to improve credit flexibility and ensure that outcomes are rewarded wherever possible. 10% of the project's targeted level have been designated to this criterion. • Language and reference to Ecn-1 for significant decisions. • Credit guidance to incorporate SSP climate scenarios. • Language regarding MCA process to improve consistency across all applicable credits. <p>Revised</p> <ul style="list-style-type: none"> • Credit language to align with changes in Verification Procedure to include ISC Review and Agreement of the Base Case Proposal. • As Built criteria order to align with Design phase updates. • Options assessment criteria to be a singular D/AB criterion to allow for the implementation of the 'optional' component. <p>Feedback not addressed</p> <ul style="list-style-type: none"> • The inclusion of the formal assessment of reduction opportunities remains best practice for identifying and implementing the most effective, practicable options and hence projects are not awarded full points if they do not undertake this step. As

that "and quantities" is removed from this must statement.

previously noted in the initial summary of updates, the ISC simultaneously recognise that good outcomes can be achieved and should be rewarded without undertaking the MCA process. Subsequently, the ISC satisfies both perspectives by utilising an optional criterion.

- “And quantities” has been retained in must statement. The Base Case Proposal details where, or how, water quantities that are included in the project’s models will be sourced, calculated and derived. Therefore, it is appropriate to say the quantities must be consistent with these details.

<p>Wat-2 Appropriate Use of Water Sources</p>	<p>There is inconsistency and a disconnect in how all resource related credits are benchmarked. Suggest ISC attribute the 'scaling credit' function to Wat-2 where points are attributed solely on % of alternatives supporting the project.</p> <p>There is no upper limit after 5 years payback period.</p> <p>Positive feedback: The additional guidance for Wat-2 in the multi-criteria options assessment, specifically defining significance thresholds based on total capital expenditure provides clearer and more detailed guidance compared to V2.1.</p>	<p>Updated</p> <ul style="list-style-type: none"> • Language and reference to Ecn-1 for significant decisions. • Level 3 payback period requirements to incorporate an upper payback period of 10 years. • Language regarding MCA process to improve consistency across all applicable credits. • Credit language to include minor editorial improvements. <p>Revised</p> <ul style="list-style-type: none"> • Terminology used throughout the credit to consistently apply the term lifecycle water demand and reference Wat-1. This aims to improve clarity. <p>Feedback not addressed</p> <ul style="list-style-type: none"> • The ISC have not amended the credit structure for Wat-2 at this stage. Unfortunately, it is not always practical to place the same credit structure and approach across all resource related matters as each one presents different impacts, opportunities and challenges. <p>The ISC changed v2.1 Wat-2 to be focussed on a practical investment basis following feedback received from Version 1.2, where this credit was previously more aligned with the structures of Ene-2 and Mat-2/Rso-7. The sourcing of water from alternative sources was found to bring with it a range of other issues and impacts that are not present when sourcing materials or energy. By incorporating payback periods and not assessing against the total water consumption substituted, this was found to avoid unproductive spending and is flexible to a wide range of project scenarios.</p>
<p>Eco-1 Ecological Protection and Enhancement</p>	<p>The requirement for land based like for like offsets explicitly excludes financial offsets, including payments into regulatory offsetting funds.</p> <p>The credit is complex and has significant overlap with regulation in many jurisdictions.</p>	<p>Updated</p> <ul style="list-style-type: none"> • Several Level 1 criteria to more succinctly assess 2 key areas. This has drastically reduced the administrative burden of Level 1. The primary focus of the credit has moved to become: <ol style="list-style-type: none"> 1) The quantification of ecological impacts. 2) The management measures in place to ensure the ecological value of site and of the claimed offsets is being done effectively such that the outcomes will be realised.

Positive feedback: The removal of several Level 1 criteria is an improvement in terms of overlap with regulation, time and admin for projects.

Metrics need to be defined for consistency (and best outcome) or just make the assessment meet local jurisdiction requirements.

Payment into the NSW Biodiversity Conservation Fund to meet project offset obligations (due to market credit unavailability in time) does not satisfy ISC's definition of suitable offsets, despite being a scheme guaranteed by the NSW Government, for which the NSW Environment Minister is accountable

- Level 3 to incorporate Ruling Eco-1.10 clarifying the calculation methodology for demonstrating 50% project-led enhancement has been achieved.
- Design phase language to clarify that commitment to a suitable form of biodiversity offset is sufficient.

Removed

- Level 1 requirements to demonstrate the implementation of measures, as these are inherently covered in the quantification of ecological value, focussing the credit more on assessing outcomes.
- Several requirements relating to the ecological impact assessment to reduce admin burden. Given existing regulatory process and the involvement of an SQP, the level of detail could be reduced.

Feedback not addressed

- The ISC have not modified the requirements for acceptable biodiversity offsets at this stage. There are considerable concerns and uncertainty surrounding many biodiversity offsetting practices. To ensure the outcomes ISC are certifying are accurate and appropriate, projects must be able to demonstrate that the ecological value they are claiming is real and has occurred.
Note that if fund managers fulfill their obligation using land-based offsets, these may be appropriate to claim under Eco-1. In several regions, the fund manager will publicly disclose when these obligations have been fulfilled.

CI Register

- Guidance on applicable metrics has not been updated at this stage, primarily due to considerable variance in regulatory process across Australia and New Zealand. The use of an SQP to determine appropriate metrics for the specific project and context provides the greatest flexibility at this time. A CI item will be raised to monitor this going forward.
- Projects electing to satisfy their offset obligations by paying into the NSW Biodiversity fund may still be able to meet the offsetting requirements of Eco-1, by demonstrating that the obligations have been fulfilled by NSW DCCEEW at the time of project completion (As Built submission) through the use of NSW DCCEEW's obligation tracking registers.
The ISC are engaged with NSW DCCEEW and continue to monitor the impact of reform currently being introduced to biodiversity funds with the intention to provide rating process efficiencies should their effectiveness be demonstrated.

Sta-1 Stakeholder Engagement Strategy

Positive feedback: Modifications helps consolidate evidence for DL1.2 and 1.3 and requires less admin for ABL1.2

Updated

- Stakeholder engagement strategy development criteria to include consideration for local context.

Removed

	<p>Minor editorial issues v2.2. 'TM on Display'</p> <p>For projects that don't have above ground works or have a limited scope potential for more flexibility to define applicable stakeholder.</p>	<ul style="list-style-type: none"> Standalone requirement for strategy to be informed by local context as the desired outcome has now been achieved with a minor update to the prior criteria, reducing administrative burden. <p>Feedback not addressed</p> <ul style="list-style-type: none"> The ISC have not modified the requirements further, as it is felt that the credit already allows significant flexibility in defining the stakeholders, and any project specific scenarios not covered can be addressed through a project TC.
<p>Sta-2 Stakeholder Engagement and Impacts</p>	<p>The criteria in Level 3 are subjective and some do not directly relate to outcomes delivered. The must statement 'the size, nature and representation of the sample group from which feedback is sought must be determined and justified' is challenging.</p> <p>Positive feedback: Appreciate less admin due to removed ABL2.2 lessons learnt requirements. Positive changes generally are fully supported.</p> <p>Minor editorial issues v.2. 'TM on Display'</p> <p>Achieving Level 3 requirement for 75% stakeholder satisfaction at Design phase is challenging. This benchmark is more appropriate at the As Built stage only.</p>	<p>Removed</p> <ul style="list-style-type: none"> Lessons learnt criteria at the commencement of As Built to avoid reduce administrative burden. Reference in ABL3.1 to the deleted ABL2.2 criteria (detailed above). Level 3 requirement for 75% stakeholder satisfaction at Design phase. <p>Feedback not addressed</p> <ul style="list-style-type: none"> The Level 3 criteria have not been addressed at this stage.
<p>Leg-1 Leaving a Lasting Legacy</p>	<p>The included restrictions and caveats in the notes sections can act as a barrier for rewarding outcomes by projects.</p>	<p>Updated</p> <ul style="list-style-type: none"> Language and examples used in the notes section relating to initiatives relating to the project purpose, improving credit applicability to a wider range of initiatives. Language used in Level 1 criteria to ensure any initiative being claimed can be clearly linked to the identification of a priority and an action being taken in response.
<p>Her-1 Heritage Protection and Enhancement</p>	<p>There's no consistency between level of community involvement between credits, such as Lea-1, Env-2, Env-3,</p>	<p>Updated</p> <ul style="list-style-type: none"> V2.2 'TM On Display' editorial refinements.

Env-4.

In some regions, it is not considered best practice to undertake a heritage assessment aligned with the Burra Charter/ICOMOS. The reference to the Charter/ICOMOS could be replaced with a link to the most appropriate heritage legislation for the project's jurisdiction.

It is not appropriate for non-Indigenous stakeholders to comment on Indigenous matters.

Minor editorial issues v2.2. 'TM on Display'

Suggest that Level 2 design requirement (where external stakeholder groups have been invited but decline to participate) is carried across to the As Built stage.

Potential ambiguity over the quantity of interpretation measures to be implemented for Level 3.

- Level 2 design stage requirement (where external stakeholder groups have been invited but decline to participate) carried across to the AB stage.

CI Register

- The feedback on 'quantity of interpretation measures to be implemented' for Level 3 item has been added to the ISC's CI Register for heat mapping and future consideration.

Feedback not addressed

- The Stakeholder engagement requirements across Lea, Env and Her continue to be incorporated in different ways. Unfortunately, it is not always practical to place the same credit structure and approach across all external stakeholder engagement related matters as each one presents different relevance, opportunities and challenges. Engagement with external stakeholders is understood to be particularly relevant to the Heritage category, as this is a fundamental component of identifying heritage values of a given region and subsequently this makes it a Level 1 requirement.
- The reference to ICOMOS/Burra Charter has been retained. This is understood to be industry best practice by the ISC and subject matter experts.
- The ISC note that there is no requirement to demonstrate that all stakeholders have commented on all identified heritage items.

Wfs-1 Jobs, Skills and Workforce Planning

With many contractual models and project delivery timeframes, it is virtually impossible to implement DL1.1 and DL1.2 meaningfully in the design stage.

Wfs-1, 2 & 3 credit requirements must also be reviewed by People/Resourcing/ Human Resources professionals with experience in leading large Alliance structures not

Updated

- Scoring methodology such that Design is assessed separately from As Built and Design no longer acts as a prerequisite for As Built to allow better flexibility of criteria across more delivery models.

Removed

- Level 2 requirement for projects to demonstrate objectives are aligned with industry and government jobs and skills objectives.

Feedback not addressed

- Like many social related credits, simplifying the benchmarking performance by using a quantifiable metric is incredibly challenging. In the wake of this, demonstrating that best practice process has been implemented is currently the only reasonable way to

just participating sustainability professionals in working groups.

Minor editorial issues v2.2. 'TM on Display'

It is still challenging for Design & Construct contractual models to achieve the Design criteria, but the separation from the As Built criteria is appreciated.

Wfs-2 Workplace Culture and Wellbeing

Current guidance includes designers in workforce, a group rarely managed by Contractor directly. This group is often working while project is mobilised and ceases sometimes prior to main works commencing.

Employee definition does not account for complexity some business models, particularly for large scale projects.

Must statements & relevant evidence requirements are focused more towards demonstrating processes implementation than positive outcomes.

Positive feedback: Definition of direct employee and worker allows credit to be flexible. The change in survey participation rate is a positive as this is often a large barrier for many projects.

Minor editorial issues v2.2. 'TM on Display'

benchmark projects.

Rewarding projects on the basis of implementing a number of initiatives leaves holes in the assessment and could result in certification outcomes not accurately reflecting the project's actual practice.

Clarification

- Design & Construction contractual models are still able to achieve the Design criteria, but this may be impacted by the timing of their appointment, the level of workforce planning undertaken during their tender application & potentially proponent actions.

Projects are encouraged to review updates to this credit in detail. Substantial changes and modifications have been made. Not all criteria modifications can be noted succinctly here.

Created

- Separate definitions for 'Worker' and 'Direct Employee' to allow better flexibility of criteria across more delivery models. Note that it is important that the Wfs-2 and Wfs-3 credits aim to address more than those directly engagement under the alliance or head contractor to ensure equivalency and fairness for all Rating Tool users. For the people engaged to deliver a project, their value, importance and expected level of support remains constant regardless of the project and it's delivery model. It is important to recognise that the elected delivery model can significantly impact the sustainability performance of a project.

Updated

- Required participation rates for surveys to a lower benchmark, making Level 1 more accessible and accounting for instances where some personnel are not as easily involved to participate.
- D/ABL2.1 to require that the 'agreed actions' are to be developed collaboratively with relevant team members.
- D/ABL2.2 criteria to offer an additional pathway (in place of just surveys) for projects looking to demonstrate an improvement.

Moved

- Level 2 requirement for a not-for-profit partnership to Level 3.
- Level 3 requirement to demonstrate an improvement in survey results to Level 2. Note that this is in conjunction with the revised definitions to relate to 'Direct Employees' only if targeting Level 2.

Removed

- Level 3 requirement to extend the culture and wellbeing program to include the families of the workforce to reduce the scope of the credit.

CI Register

The D/ABL2.1 requirement for 'agreed actions' with senior management team could encourage a top down & non-collaborative approach (i.e. perverse outcome).

The DL2.2 survey requirement is limiting for some projects.

For Level 3, the head contractor will have limited influence over the subcontractors and therefore won't be able to achieve this criterion.

For Level 3, how can design firms (supplying designers from across the world) be impacted by the culture and wellbeing programs as well as have an impact on the programs?

The proposed 100 hours booked to the project for 'direct employee' & 'worker' is arbitrary – propose to use the average works working day per the Fair Work Act 2009 (38 ordinary hours per week for a full-time employee, which translates to approximately 7 hours and 36 minutes per day, while also permitting reasonable additional hours).

Propose amending definitions to: "...person working on the project who has booked **>300 hours** to the project in the **3 months** prior to the

- Re: subcontractors & designers – this is a Level 3 requirement and it is considered 'world leading best practice' to include all project team members. Exceptions should not be made for specific delivery models. However, the comments are noted and will be added to the ISC's CI Register for heat mapping and future consideration.
- Re: number of hours definition – the intent of a specific number of hours within the definition is to cover all types of scenarios (e.g. part-time employees, flexible working arrangements etc.) and to try and capture 'the majority of the workforce at that point' but also not have it applicable to every person on the project. However, the suggested hours are noted and will be added to the ISC's CI Register for heat mapping and future consideration.

Projects are encouraged to review updates to this credit in detail. Substantial changes and modifications have been made. Not all criteria modifications can be noted succinctly here.

survey being distributed and is still expected to be engaged on the project at the time of the survey **and for 3 months post the survey...**".

Wfs-3 Diversity and Inclusion

Employee definition does not account for complexity some business models, particularly for large scale projects.

Most statements & relevant evidence requirements are focused more towards demonstrating processes implementation than positive outcomes.

Minor editorial issues v2.2. 'TM on Display'

Use of survey for perceptions while is useful does not always cover a holistic representation of employee satisfaction. Used in combination with other measures should also be considered.

Created

- Separate definitions for 'Worker' and 'Direct Employee' to allow better flexibility of criteria across more delivery models. Note that it is important that the Wfs-2 and Wfs-3 credits aim to address more than those directly engagement under the alliance or head contractor to ensure equivalency and fairness for all rating tool users. In some delivery models, this would only account for a minority of the workforce delivering the project.
For the people engaged to deliver a project, their value, importance and expected level of support remains constant regardless of the project and it's delivery model. It is important to recognise that the elected delivery model can significantly impact the sustainability performance of a project.

Updated

- Required participation rates for surveys to a lower benchmark, making Level 1 more accessible and accounting for instances where some personnel are not as easily involved to participate.
- Definitions to incorporate ruling Wfs-3.01 regarding the diversity team or committee.

Removed

- Level 3 requirement to embed diversity and inclusion requirements into senior management performance agreements to reduce scale of the level.
- Level 3 requirement to require the collection of additional diversity and inclusion data to reduce the scale of the credit.

Feedback not addressed

- The Level 1 criteria already includes measures beyond surveys.

Projects are encouraged to review updates to this credit in detail. Substantial changes and modifications have been made. Not all criteria modifications can be noted succinctly here.

Wfs-4 Sustainable Site Facilities

The credit rewards points only if 100% of RCLG initiatives are implemented and no points are awarded for a % of these initiatives. Also there often are many cribbing caravans/offices on site and lot of admin effort required to assess each one.

Updated

- Scoring methodology to improve flexibility of credit and reward projects for partial implementation where possible.
- Language used in criteria to more specifically call out which RCLG criteria are applicable.

Feedback not addressed

- No further exclusions to buildings beyond what is already provided in the notes has been included.

Positive feedback: The new calculation method for this credit is very positive, it provides flexibility and clarity as a portion of the points are available based on the achieved /specified requirements and not the number of facilities with 100% requirements achieved/ specified.

To be further adjusted to account for a 'per head' assessment where site facilities that have a greater proportion of staff have greater weighting.

It is recommended that Wfs-4 takes into account these viable situations so that projects such as regional projects can still be rewarded this credit even if some line items have justifiably been deemed not value-adding.

CI Register

- The 'per head' suggestion will be added to the ISC's CI Register for heat mapping and future consideration.
- Defining viability criteria to be added to the CI Register for heatmapping and future consideration.