**Construction Waste Lab (CWL),
School of Property, Construction
and Project Management**

GPO Box 2476
Melbourne VIC 3001, Australia

www.rmit.edu.au
Tel: +61 39925 2230
Fax: +61 3 9925 1939

Australian Building Codes Board (ABCB) Office
GPO Box 2013
ABCB Office
Canberra ACT 2601

Phone: +61 2 1300 134 631
Email: ncc@abcb.gov.au

06 June 2024

Re: National Construction Code Public Comment Draft

The RMIT Construction Waste Lab (CWL) welcomes the opportunity to provide a submission to the House Standing Committee on Environment and Communications inquiry into the effectiveness of federal government's waste reduction and recycling policies.

Since 2018, RMIT CWL has been at the forefront of researching the circular economy of construction and demolition (C&D) waste. Our industry-driven research covers a wide range of C&D waste management aspects, including policy, education, circular supply chains, and innovative waste solutions and technologies. In collaboration with various state public agencies and private organsations, we have actively raised awareness in both sectors.

Members at RMIT CWL have been deeply involved in analysing state and national waste policies and recycled materials specifications, leading to a set of recommendations aimed at enhancing the C&D waste management system in Australia. Please find below our perspectives regarding the following changes:

(a) Improving fire safety Performance Solutions

In updating the Australian Fire Engineering Guidelines (AFEG), it is important to include guidance on handling products with recycled content (PwRC). This guidance can then be linked to the 'Optional Quantification Framework' proposed in this update. Additionally, as for 'A More Detailed Discussion on Applying Engineering Judgment' should encompass the challenges and requirements of PwRC fire safety Performance Solutions.

Our research has shown that one the major hurdles in using PwRC in the sector is 'lack of expertise and understanding of PwRC', 'inconsistency of PwRC quality, performance and warranty' (see an example here: https://doi.org/10.1108/SASBE-08-2023-0213). Hence, we think that if these propose changes also account for this issue it can help optimise use of these resources in the sector.

(b) PCD 2025 - Fire hazard properties (NCC Volume One)

With the growing demand for PwRC in the Australian building and construction sector, we recommend that when the PCD refers to a building product, it clearly states whether or not it applies to PwRC as well. These products may consist of materials with different physical and chemical properties compared to their conventional counterparts. These variations can lead to diverse and sometimes unpredictable reactions during fire events. Consequently, this may have implications for the types of fire safety testing regimes required for building products and could alter the process of engaging Accredited Testing Laboratories (ATL) for these tests.

(c) PCD 2025 - Use of an Accredited Testing Laboratory

We believe that Accredited Testing Laboratories (ATLs) engaged in fire safety tests should be equipped to conduct specific assessments of the fire hazard properties of PwRC. To support these service providers, the new changes can also prescribe some primary test procedures tailored for this purpose.

Thank you for consideration of RMIT CWL's submission, if there are any queries, please contact the undersigned.

Yours sincerely

Dr Salman Shooshtarian
Senior Lecturer, Deputy Director of RMIT Construction Waste Lab
School of Property, Construction and Project Management, RMIT University
E: salman.shooshtarian@rmit.edu.au

Professor Tayyab Maqsood
Head of Project Management, Co-director of RMIT CWL
School of Property, Construction and Project Management, RMIT University
E: tayyab.maqsood@rmit.edu.au

Professor Peter SP Wong
Head of Construction Management, Co-director of RMIT CWL
School of Property, Construction and Project Management, RMIT University
E: peter.wong2@rmit.edu.au