

GS1 Australia

Discussion paper for industry and government

Member and Industry Partner Discussion Paper

What Does Assurance Look Like When the Building Is Made in a Factory?

A contribution to the Australian Building Codes Board consultation on the National Voluntary Certification Scheme for Manufacturers of Prefabricated Construction

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About this paper.

This paper is offered as thought leadership to inform the ABCB's consultation on the National Voluntary Certification Scheme for Manufacturers of Prefabricated Construction. It is written to *ask the questions* that government and industry may find useful, rather than to prescribe answers.

GS1 Australia is a neutral, not-for-profit standards organisation; we do not seek to redesign building regulation, certification or inspection practice, nor to advance a single-vendor or single-standard agenda. Our contribution is confined to areas where global supply chain standards expertise can add value, including data quality, identification of products, parties, and locations, source-generated commercial data, interoperability, verifiable evidence and credentials, trusted and discoverable data reuse, supply chain visibility, and alignment with international standards.

Where questions are operational, prefabricated construction manufacturers, building surveyors and certifiers, certification bodies, builders, developers and the industry associations are better placed to answer, and we say so.

Consultation closes 11:59 pm AEST, Tuesday 15 September 2026.

GS1 Australia's own survey response is published alongside this paper at <https://www.gs1au.org/government-and-public-policy>

Key points of this paper

The ABCB's draft Economic Analysis identifies alignment with GS1 standards as the “**preferred interoperable pathway**” for traceability (§4.4.3), while the draft Scheme Rules leave both technology *and* method to manufacturer discretion. The points below follow from that gap.

#	Key point	Why it matters
1	GS1 Australia supports the Scheme and the shift to systems-based assurance for factory-completed work.	Our comments concern how the model is made verifiable in practice, not whether it should proceed.
2	Technology neutrality and standards neutrality are not the same thing, and the drafting treats them as one (Table 1; Rule 2.5.11).	Choice of carrier - barcode, QR, RFID, fixed plate - should be preserved. Discretion over the identification <i>method</i> produces data that other organisations cannot read.
3	Discretion combined with cost-minimisation predicts fragmentation. The 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.
4	“Unique product identification” on the Manufacturer Declaration of Conformity is undefined (Rule 2.5.15(c)(1)).	Two certified manufacturers could issue the same identifier, and a building surveyor could not tell them apart. Records must remain resolvable for at least ten years (Rule 2.5.11(b)).
5	Verification at handover should be a check against an authoritative record, not a review of accompanying paperwork (Appendix B, step 9).	This is the moment the Scheme either earns the confidence of building surveyors or does not.
6	Table 10 of the Economic Analysis prices identification standards as an alternative to QR codes, RFID and Digital Product Passports.	This contradicts §4.4.2.3 of the same report. Standards are the identification layer; QR and RFID are carriers that encode it, so the cost of the preferred pathway is overstated.
7	How traceability cost is characterised bears on who can afford to take part.	Break-even sits at 36 Class 1 or 23 Class 2 builds a year, and the analysis warns benefits may concentrate among larger manufacturers (§4.3.3.2).
8	Recall obligations are not matched by identification requirements (Rules 2.5.5(a)(4), 5.5(e), 2.5.11(a)(2)).	A recall must follow ACCC guidelines, but nothing specifies whether identification is at model, batch or unit level - and that determines whether one can be executed.
9	Cross-border operation argues for internationally recognised standards.	Table 1 expressly seeks feedback on pathways for overseas manufacturers, and the EU mandates Digital Product Passports for construction products from 2028 (§4.4.2.4).

We do not comment on: voluntary versus mandatory; practitioner licensing; insurability; fee levels and cost recovery; surveillance frequency; expansion beyond Class 1 and Class 2.

These questions are for manufacturers, certifiers, insurers and the industry associations.

1. Executive summary

The Australian Building Codes Board is consulting on a national voluntary certification scheme for manufacturers of prefabricated construction, targeted to commence by mid-2028. The Scheme would certify a manufacturer's *systems* - quality management, factory production control, workforce competency, traceability, change control - rather than inspect each building stage by stage on site. Subject to legislative change in each jurisdiction, factory-completed work covered by a Manufacturer Declaration of Conformity (MDoC) would be excluded from re-inspection.

Under current arrangements a building surveyor forms a view by looking at the work. Under the proposed Scheme, for factory-completed work, they will not be looking at the work. **They will be relying on a declaration and on the systems behind it.** Traceability is what makes that defensible.

This paper does not argue about whether the Scheme should proceed. It asks a narrower question that we think industry is best placed to answer: *if assurance now travels as data rather than as inspection, what has to be true of that data?*

The finding that shapes this paper

The ABCB's own draft Economic Analysis has already done much of this thinking. It assesses four traceability options against four principles - accessibility, interoperability, assurance and scalability - and frames three pathways: QR-enabled identification as a baseline, **alignment with GS1 standards as the "preferred interoperable pathway"**, and Digital Product Passports as future maturity (§4.4.3). It records that these standards do not mandate any particular technology (§4.4.2.3), and states plainly that *"inconsistent standards adoption could lead to fragmented or siloed data systems"* (§4.4.4.3).

The draft Scheme Rules do not reflect any of this. They leave *both* the technologies *and* the methods to manufacturer discretion. This paper is largely an exploration of that gap and what follows from it.

What this paper offers

This is a paper of questions and observations. It:

- explains in plain terms what the Scheme proposes and where traceability sits within it;
- distinguishes technology neutrality, which should be preserved, from standards neutrality, which may not survive contact with cost-minimising behaviour;
- tests what "unique product identification" would need to mean for a building surveyor to rely on it;
- asks whether a recall obligation can be discharged at the identification granularity the Rules currently require;
- identifies a classification error in the Economic Analysis cost table and explains why it matters to smaller manufacturers; and
- states GS1's own limits as clearly as its contribution (Box 1).

Box 1 - How to read the evidence in this paper documented in the consultation: stated in the ABCB's Discussion paper, draft Scheme Rules or draft Economic Analysis - cited by section or page and used as firm evidence. **Established standard:** published international standards, including those identically adopted as Australian Standards - used as firm evidence. **Illustrative example:** case studies drawn from the ABCB's own Appendix F, or clearly-flagged hypotheticals - offered to make a point tangible, not as proof. **GS1-specific contribution:** where supply chain standards expertise adds value - offered as input, with limits stated. **Better answered by industry:** questions for manufacturers, surveyors, certifiers or the associations - flagged, not assumed.

2. Purpose and scope

This paper responds to the ABCB’s July 2026 consultation, comprising a proposed NCC definition of Prefabricated Construction, draft Scheme Rules, a draft Economic Analysis and a supporting Discussion paper.

In scope

- Identification of components, parties, locations and consignments, and what “unique” needs to mean for reliance.
- Traceability as required by Rule 2.5.11, including the ten-year retention obligation and traceability that crosses organisational boundaries.
- The Manufacturer Declaration of Conformity as an evidentiary artefact, and its verification at the point of installation and handover.
- Interoperability between manufacturers, certification bodies, builders, surveyors and jurisdictional systems.
- The characterisation of traceability costs in the draft Economic Analysis.
- Alignment with international standards, including those identically adopted as Australian Standards.

Out of scope

- Whether the Scheme should be voluntary or mandatory - a policy question for government and the associations.
- Practitioner licensing and registration, insurability, fee levels and cost recovery quantum, and audit and surveillance frequency - all better answered by manufacturers, certifiers, insurers and the associations.
- Expansion of the Scheme beyond Class 1 and Class 2 buildings, except where identification granularity is affected.
- Any judgement about whether a particular design or building complies with the NCC. That is a determination for accountable practitioners.

3. What is being proposed, in plain terms

A manufacturer would be certified once, by an independent certification body accredited for the purpose, against their systems rather than their individual buildings. Certification would be valid for three years, with periodic risk-based surveillance in between.

Three documents come out of the Scheme:

Certificate of Conformity	Certification Body	The manufacturer’s systems meet Scheme requirements, within a defined scope
Manufacturer Declaration of Conformity (MDoC)	The certified manufacturer	This building or component was made to the approved specification
Design Approval Certificate (optional)	Design Assessment Body	A repeatable design meets NCC Performance Requirements

The Scheme is limited to Class 1 and Class 2 buildings and to five categories of prefabricated system, from fully fitted-out 3D volumetric modules through to engineered products such as CLT, LVL and insulated

concrete formwork. Prefabricated construction currently accounts for less than 8% of Australian construction (Economic Analysis, §3).

The Scheme is complementary, not a replacement. Planning permits and building approvals continue under existing state and territory arrangements, and regulators retain their existing powers. What changes is the evidence a surveyor relies on for factory-completed work.

4. Why traceability carries more weight in this model

The Scheme Rules ask a certified manufacturer to maintain traceability systems capable of:

linking finished Components to the Manufacturer Declaration of Conformity, production batches, materials, and inspection activities for access and verification along the length of the supply chain, including at the point of installation and handover (Rule 2.5.11(a)(1))

and of identifying affected components where defects, failures or non-compliances emerge. Records must be retained for **at least ten years**, or longer where statutory liability requires (Rule 2.5.11(b)). The Economic Analysis draws a distinction worth carrying through this paper. **Internal traceability** is record-keeping inside one organisation or plant. **External traceability** is following something as it moves through the wider supply chain, between organisations (§4.4.1). Rule 2.5.11 plainly requires the second kind: records that other parties, in other organisations, can act on at installation and handover.

That distinction matters because most manufacturers already have internal traceability that works well for them. The question the Scheme raises is different.

Questions manufacturers and certifiers could consider Your factory records probably work well for you. If a certification body, a builder, a building surveyor and - ten years from now - a defect investigator each needed to use them, would they still work? What would each of them actually receive? Where does your traceability currently stop: at the factory gate, at dispatch, at delivery, or at installation?

5. Are “technology neutral” and “standards neutral” the same thing?

The Discussion paper’s scope table states that traceability is within scope but *“the specific technologies and methods used to achieve traceability are at the discretion of the manufacturer, provided the outcomes meet Scheme requirements”* (Table 1, emphasis added).

We think two different decisions are being treated as one.

- **The technology is the carrier** - a printed barcode, a QR code, an RFID tag cast into a panel, a plate riveted to a module frame. Which suits you depends on your product, your environment and your budget. A timber frame manufacturer and a precast concrete manufacturer will reasonably choose differently. Leaving this open is sensible and should stay that way.
- **The standard is the rule about what the identifier means** - whether it is unique only inside your business or unique worldwide, how it is structured, whether another organisation’s system can read it without a bespoke integration, and whether it still resolves in a decade.

Interoperability lives in the second decision, not the first. The Economic Analysis makes the same point in technical language when it notes that physical carriers *“must encode GS1-compliant identifiers”* for interoperable exchange to function (§4.4.4.3).

The relevant standards are already Australian Standards. Standards Australia has identically adopted ten of the underlying ISO/IEC standards, including the AS ISO/IEC 15459 series for unique identification and

AS ISO/IEC 15418 for structuring data alongside an identifier. Construction was among the sectors consulted in developing those adoptions. The full list is at Annex A.

A limit worth stating. Identification standards determine that a component can be named unambiguously and its records found. They do not determine whether that component complies with the NCC, whether a design meets a Performance Requirement, or whether a manufacturer's quality system is adequate. Those remain determinations for certification bodies, design assessment bodies and building surveyors. Identifiers are an input to those determinations, not a substitute for them.

Questions the ABCB and industry could consider Should the Scheme Rules preserve discretion over technology while specifying that identification and data exchange use recognised standards - or is discretion over both the better answer? In your operation, who chooses the carrier and who chooses the identification scheme? Are they even separate decisions today, or has the scheme come bundled with whichever software you bought?

6. What happens if every manufacturer decides independently?

The Economic Analysis makes an explicit and, in our view, realistic assumption about behaviour:

“manufacturers are assumed to adopt the lowest cost solution that satisfies Scheme requirements. This reflects the assumption of cost-minimisation behaviour by industry, particularly where there are numerous options available.” (p.82)

That is a fair prediction. It is also worth following to its conclusion. If both technology and method are discretionary, and each manufacturer independently selects the cheapest option that clears the audit, the rational outcome for each firm is a self-contained system that satisfies a certification body and does nothing else.

This is not a failure of goodwill. It is a coordination problem. No individual manufacturer captures the benefit of making their data readable by a competitor's customer, so none has a commercial reason to pay for it. Interoperability is a shared good. Where a shared good is left to individual discretion under cost pressure, it is generally not produced.

Illustrative. Say a builder is assembling a Class 2 development using volumetric modules from one certified manufacturer, façade panels from a second and prefabricated bathroom pods from a third. If each has implemented a different identification scheme, the builder reconciles three unrelated numbering systems by hand at handover, and the surveyor reconciles them again. Nothing in the Rules as drafted prevents this.

The cost does not usually appear under a heading called “traceability”. The ABCB's own Legrand UK & Ireland case study shows where it does appear: roughly 30,000 internally manufactured items and 12,000 sourced from international suppliers, managed through spreadsheets and manual entry, where data inconsistencies “*complicated integration with wholesalers and customers delivering large-scale infrastructure projects*” (Appendix F 7.6.3.2). It surfaced as integration work, rework and delay.

Questions for manufacturers and builders If you supply into multi-source projects, how many customer-specific labelling and data formats do you already maintain? What would one more cost you? If the honest answer is “not much, individually” - what is the total across the sector, and who ends up paying it?

7. What will “unique product identification” mean on your MDoC?

Rule 2.5.15(c)(1) requires every Manufacturer Declaration of Conformity to carry “*unique product identification, sufficient to trace the Component to manufacture.*” The Rules do not say unique to whom.

As drafted, an identifier unique within your own production system appears to satisfy the requirement.

Illustrative. Two certified manufacturers could each issue a component numbered MOD-0417 - both legitimately, both compliant. A building surveyor holding one MDoC would have no way to tell which manufacturer’s component was in front of them without returning to the project paperwork. The declaration would have told them less than it appeared to.

The **AS ISO/IEC 15459 series** exists precisely to prevent this. It sets out how identifiers are constructed so they are unambiguous worldwide, and how issuing agencies are registered and recognised (Parts 2 and 3).

The ten-year retention obligation adds a second dimension. Consider a manufacturer acquired in year four, migrated to the acquirer’s ERP in year five, with the original numbering retired in year six. In year eight a defect emerges. Are the identifiers on the MDoCs issued in year one still resolvable? If those identifiers were issued inside a software subscription rather than under a registered scheme, what happens when the subscription lapses or the provider exits the market?

This is not a hypothetical risk profile for a young sector. It is the ordinary lifecycle of businesses in a growing industry.

Questions for manufacturers If your business changed hands tomorrow, or you changed systems, would the identifiers on MDoCs you issue this year still mean anything in 2036? Who would be able to confirm that - you, your software provider, or an independent register? Does your current identification scheme belong to you, or to a vendor?

8. What actually happens at handover?

Appendix B of the Discussion paper maps the process from building permit to occupancy permit. At **step 9**, the Appropriate Authority undertakes on-site inspections, and prefabricated components accompanied by an MDoC are excluded from inspection for factory-completed work.

This is the moment the Scheme either earns the confidence of building surveyors or does not. The surveyor must satisfy themselves that this module is covered by a valid declaration, from a manufacturer whose certification is current, and within the scope of that certification.

The information exists: the Scheme Administrator will maintain public registers of certified manufacturers and factory locations, certification status, scope and conditions, and a register of Design Approval Certificates (Rule 2.2.5). The open question is how a surveyor gets from the module in front of them to the register entry.

Illustrative example from the ABCB’s own report. ACRS - a steel certifier accredited by JAS-ANZ - operates a cloud platform linking QR codes on steel products to digital certificates, letting industry verify conformance with Australian and New Zealand Standards. The ABCB’s analysis observes that this shows how a relatively low-cost approach can link a physical building product to trusted compliance information without complex digital infrastructure (Appendix F 7.6.1.1).

The mechanism for resolving an identifier on a product to authoritative information about it is itself standardised, and is an Australian Standard: **AS ISO/IEC 18975**, encoding and resolving identifiers over HTTP.

Questions for building surveyors and certifiers At your last handover involving prefabricated components, how long did document reconciliation take, and how many people touched it? What would you need to be able to check, and how quickly, before you were comfortable relying on a declaration instead of an inspection? Would a check against an authoritative register change that comfort level?

9. Could you execute a recall if you had to?

Certified manufacturers must hold procedures for identifying, notifying and managing product recalls, and must conduct any recall in accordance with the ACCC Consumer Product Safety Recall Guidelines (Rule 2.5.5(a)(4)). The same obligation applies to design approval holders (Rule 5.5(e)).

But nothing in the Rules requires identification at a **granularity** that makes a recall executable. Traceability records must be capable of “identifying affected Components” (Rule 2.5.11(a)(2)) without specifying whether that means the model, the production batch, or the individual unit.

The difference is not academic.

Illustrative. Say a fixing supplied over a six-week window is found to be non-conforming. At model level, every module of that model ever produced is potentially affected. At batch level, you can narrow it to the weeks concerned. At unit level, you can name the specific modules and the addresses they were installed at. The first two scenarios are the same recall notice; the third is a phone call to eleven owners.

The Level project on the Afsluitdijk sea dam in the Netherlands, cited in the ABCB’s report, embedded an identifier in each individual concrete block during manufacture and read it automatically through production and installation. The report notes this eliminated manual counting and enabled “*timely intervention where quality or compliance issues were identified with individual block*” (Appendix F 7.6.2.1).

Questions for manufacturers and regulators If you were told this afternoon that a component supplied over a defined period was non-conforming, how many buildings would you have to contact - and how many would you actually need to? Should the Scheme Rules specify a minimum identification granularity so that the ACCC recall obligation can in fact be discharged?

10. What will this cost, and does Table 10 answer that?

This is the one place in this paper where we say plainly that the consultation documents **contain an error worth correcting**.

Table 10 of the draft Economic Analysis (p.83) presents indicative annual traceability costs:

GS1 Standards (barcode solution)	Annual	\$675 - \$15,000	This table is flawed (not correct)
QR Codes	Annual	\$800 - \$2,400	
RFID Solutions	Annual	\$7,000 - \$140,000	
Digital Product Passport Solutions	Annual	\$16,500 - \$165,000	

The classification issue, stated plainly. Presented this way, these read as four competing products to choose between. They are not - and the same report says so fourteen pages earlier: “*GS1 standards don’t require a specific technology solution. Manufacturers can adopt QR codes, RFID tags, Digital Product Passports or other technology while maintaining a consistent identification approach*” (§4.4.2.3). Identification standards are the layer that defines what the number means. QR codes and RFID tags are **carriers** that encode it. Digital Product Passports are an **application** built on top. A manufacturer who prints a QR code carrying a globally unique identifier has bought a QR labelling capability - not a QR labelling capability *plus* a separate standards product.

Two consequences follow, and both affect how the numbers should be read:

- **It overstates the marginal cost of the pathway the report itself prefers**, by presenting as a separate purchase what is largely a decision about how you structure identifiers you are already going to print. The report's own text supports this: adoption costs "*generally relate to process changes, governance and system alignment activities*" (§4.4.2.3).
- **It omits the cost of the alternative**. The integration, reconciliation and rework costs of incompatible schemes appear nowhere in the table. They surface later as project overhead, exactly as the Legrand example shows.

Why this is more than a drafting point. Break-even under the central case requires **36 Class 1 or 23 Class 2 builds a year** (§1.3.1), and the analysis warns that firm-level benefits are sensitive to pricing, "*potentially concentrating the benefits among larger manufacturers*" (§4.3.3.2). How traceability cost is characterised therefore bears directly on who can afford to be in the Scheme at all.

Questions for the ABCB and for manufacturers Looking at Table 10, which line applies to you? If you already print labels and already run an ERP, what is the genuine incremental cost of those identifiers being globally unique rather than internal - closer to the top or the bottom of that range? Should the analysis price the cost of *not* standardising alongside the cost of standardising?

11. Does any of this work across borders?

The Discussion paper's scope table expressly seeks feedback on alternative pathways for overseas manufacturers, noting that existing requirements may be challenging for them and for manufacturers using robotics.

The cost of not having a common identification scheme across a border is measurable. The ABCB's report cites the Australian meat industry, where tens of thousands of cartons were rejected and destroyed at the US border because shipping labels were damaged or missing. A common barcode standard was agreed between the Australian and US governments as the simplest and most cost-effective way to identify and verify individual cartons; the report puts the benefit at more than **\$200 million annually** (Appendix F 7.6.3.1). Meat is not modular housing, but the mechanism is identical: a physical unit crossing a border, and two authorities needing to agree on what identifies it.

Requirements elsewhere are moving. The report notes that the European Union has mandated Digital Product Passports by 2028 for construction products regulated under the Ecodesign for Sustainable Products Regulation (§4.4.2.4). Australian manufacturers who export, or who source engineered components from Europe, will encounter this regardless of what the Scheme decides.

There is also a domestic precedent worth knowing. The report observes that a prefabricated bathroom module moved interstate is currently only guaranteed acceptance where it carries WaterMark certification - jurisdictions are not required to accept regulated plumbing work performed in another jurisdiction (§3.3.3). That is a live example, in prefab, of the cost of absent mutual recognition. It is also a reminder that the Scheme does not resolve plumbing, which the Economic Analysis identifies as a continuing design dependency.

Questions for manufacturers and government If you import components or export product, will the identification you adopt for this Scheme be recognised at the border - or will you maintain two systems? Should the Scheme's identification requirements be expressed so that an overseas manufacturer can meet them using standards they already apply for export?

12. Risks, limits and open questions

Standards left to discretion	Cost-minimising behaviour under discretion tends to produce incompatible systems.	Should the Rules specify recognised standards while preserving technology choice?
Identifier ambiguity	An identifier unique only within one factory cannot be relied on by a third party.	What should “unique” mean in Rule 2.5.15(c)(1)?
Ten-year continuity	Businesses are acquired, change systems and fail well within a ten-year window.	Do identifiers survive a change of owner, system or software provider?
Recall granularity	An ACCC-compliant recall requires knowing which units are affected.	Should the Rules set a minimum identification granularity?
Cost of entry	Break-even already sits at 36 / 23 builds a year; bespoke builds raise it further.	Does the cost characterisation in Table 10 disadvantage smaller manufacturers?
Interoperability across schemes	Prefab intersects CodeMark, WaterMark and jurisdictional approval systems.	Can Scheme registers and certificates be checked alongside existing schemes?
Over-claiming for identifiers	Identification can be mistaken for compliance assurance.	Is it clear that identifiers inform, but never make, a compliance determination?
Immaturity of newer methods	Digital Product Passports remain a future-state capability in most of the sector.	What should be required now, and what should be enabled but not mandated?

13. Questions for further exploration

Several of these are better answered by manufacturers, surveyors, certifiers or the associations than by GS1.

On the Scheme Rules

- Should the Rules distinguish technology neutrality, preserved, from standards neutrality, specified?
- What should “unique product identification” mean, and should the Rules say so?
- Should a minimum identification granularity be specified so recall obligations can be discharged?

On verification and reliance

- What would a building surveyor need to be able to check, and how quickly, before relying on a declaration in place of inspection?
- Should the Scheme’s registers and certificates be designed so they can be checked automatically, and alongside CodeMark and WaterMark?

On cost and participation

- Does Table 10 describe the choice manufacturers actually face?

- What is the real incremental cost, for a mid-size manufacturer, of identifiers being globally unique rather than internal?
- What would keep the Scheme genuinely accessible to manufacturers below the break-even volumes?

On cross-border operation

- Can the identification requirements be met by overseas manufacturers using standards they already hold?
- How should the Scheme relate to Digital Product Passport requirements emerging in export markets?

14. What GS1 Australia intends to say

For transparency, our submission to the ABCB will make the following points, and we would rather you knew our position than had to infer it:

1. We support the Scheme and the shift to systems-based assurance.
2. We agree with the finding at §4.4.3 that alignment with recognised identification standards is the preferred interoperable pathway, and recommend the Scheme Rules be amended to reflect it.
3. We recommend the Rules distinguish technology neutrality, which should be preserved, from standards neutrality.
4. We recommend that “unique product identification” in Rule 2.5.15(c)(1) be defined as globally unique, unambiguous and persistent.
5. We recommend a minimum identification granularity sufficient to make an ACCC-compliant recall executable.
6. We note the classification issue in Table 10 and ask that it be corrected.

We are a not-for-profit standards organisation. We do not sell traceability systems or certification services, and we have no commercial position in which manufacturers, certification bodies or software providers succeed under this Scheme. Our interest is that whatever is chosen works across organisational boundaries, because that is the only place traceability has value.

We would rather industry made these points than we did. If you agree, disagree, or think we have this wrong, please say so in your own submission. The ABCB is more interested in what manufacturers, builders and surveyors think than in what a standards body thinks.

How to respond

Responses are lodged through the ABCB Consultation Hub. You may answer some questions and leave others blank.

- **Consultation page:** <https://consultation.abcb.gov.au/national-voluntary-certification-scheme-for-manufacturers-of-prefabricated-construction>
- **Closes:** 11:59pm AEST, Tuesday 15 September 2026
- **Enquiries:** prefab@treasury.gov.au

For further information, please contact

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References

ABCB consultation documents, all available from the consultation page above:

- Australian Building Codes Board, *National Voluntary Certification Scheme for Manufacturers of Prefabricated Construction - Discussion paper*, July 2026. Scope table (Table 1); Appendix B process map.
- Australian Building Codes Board, *National Voluntary Certification Scheme for Manufacturers of Prefabricated Construction - Draft Scheme Rules*, 2026. Rules 1.6, 2.2.5, 2.5.5, 2.5.11, 2.5.15, 4.3.5, 5.4, 5.5.
- 35 South Advisors Pty Ltd for the Australian Building Codes Board, *Draft Economic Analysis - National Voluntary Certification Scheme for Modern Methods of Construction*, July 2026. §1.3.1; §3.3.3 (p.34); §4.3.3.2 (pp.53-54); §4.4 (pp.65-73); Table 10 (p.83); Appendix F (pp.164-169).

Standards

- Standards Australia store - <https://store.standards.org.au/>
- ISO Online Browsing Platform - <https://www.iso.org/>
- GS1 Australia, Identical Adoption FAQs - <https://www.gs1au.org/resources/faqs/identical-adoption>

Case studies cited in this paper are drawn from Appendix F of the draft Economic Analysis, which lists its own primary sources for ACRS, Levvel, BE Switchcraft, the Australian meat industry and Legrand UK & Ireland.

Annex A - Standards referred to in this paper

The following international standards have been identically adopted by Standards Australia as Australian Standards. “Identical adoption” means the international text is adopted without change, following review confirming it is suitable for use in Australia. They are available from the Standards Australia store.

ISO/IEC 15459-1:2014	AS ISO/IEC 15459.1:2023	Unique identification - individual transport units
ISO/IEC 15459-2:2015	AS ISO/IEC 15459.2:2024	Registration procedures for issuing agencies
ISO/IEC 15459-3:2014	AS ISO/IEC 15459.3:2024	Common rules for unique identification
ISO/IEC 15459-4:2014	AS ISO/IEC 15459.4:2023	Unique identification - individual products and packages
ISO/IEC 15459-5:2014	AS ISO/IEC 15459.5:2023	Unique identification - returnable transport items
ISO/IEC 15459-6:2014	AS ISO/IEC 15459.6:2023	Unique identification - groupings
ISO/IEC 15418:2016	AS ISO/IEC 15418:2023	Application identifiers and data identifiers
ISO/IEC 18975:2024	AS ISO/IEC 18975:2025	Encoding and resolving identifiers over HTTP
ISO/IEC 19987:2024	AS ISO/IEC 19987:2025	EPC Information Services - sharing event data between organisations
ISO/IEC 19988:2024	AS ISO/IEC 19988:2025	Core Business Vocabulary - shared terminology for that event data

These are Australian Standards (AS ISO/IEC). They are not joint Australian/New Zealand standards.

Also referenced in the draft Scheme Rules at section 1.6: **ISO/IEC 17065** (requirements for certification bodies), **ISO/IEC 17067** (fundamentals of product certification), **ISO 9001** (quality management systems) and **ISO 10005** (guidelines for quality plans).

This paper is provided for information and to support industry participation in a public consultation. It is not legal or professional advice. Readers should form their own view of the consultation documents and seek their own advice where relevant.