



Managing the impacts of COVID-19 on Green Star Ratings

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Purpose of this document

This document outlines guidance for how to manage the impacts of COVID-19 on your projects. It responds to potential delays to certification, and provides technical guidance for all rating tools. It provides immediate guidance for *Green Star – Performance* projects.

This document will be continually reviewed and updated as the situation unfolds. The changelog outlines all the changes over time. Previous versions of this document are available on our website.

Use of Guidance provided in this document

Project teams wishing to apply the guidance within this document must contact the project Technical Coordinator or email greenstar@gbca.org.au, subject line: COVID-19. The Technical Coordinator may instruct the project team to submit a free-of-charge technical question to provide a final ruling for use in a submission.

The GBCA will aim to provide a final response within 10 working days.

Applicability of this document

Green Star – Design & As Built, Green Star – Interiors and Legacy rating tools

This document applies to legacy rating tools and all versions of *Green Star – Design & As Built* and *Green Star – Interiors*.

Green Star for New Buildings Early Access Projects and projects registered upon the release of the new rating tool should contact the GBCA for more information.

Green Star – Performance

Guidance applies to all registered and certified buildings and portfolios regardless of version. It also applies to all buildings registered during the 2020 calendar year.

Green Star – Communities

Guidance for *Green Star – Communities* is under development. Project teams are encouraged to contact the Technical Coordinator assigned to your project, or greenstar@gbca.org.au, subject line COVID-19.

Scenarios for rating delays

For registered Green Star projects, there are a number of deadlines which apply to each rating tool:

- For all rating tools, a submission must be made within 3 years of registration;
- For all rating tools except *Green Star – Performance*, Round 2 must be submitted within 12 months of Round 1;
- For *Green Star – Design & As Built*, *Green Star – Interiors* and Legacy rating tools, As Built certification must be achieved within 24 months of practical completion;
- For *Green Star – Performance*
 - An annual submission for Year 1 and Year 2 audits, or recertification before the expiry of the initial certification; and
 - The submission must occur no more than 90 days from the end of each performance period.

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There are situations which may result in a project needing an extension, including:

- Delay of construction;
- Delay or impediment in obtaining supply chain information due to company closures;
- Project Applicants or contractors cease to exist due to liquidation or bankruptcy;
- For *Green Star – Performance*, delay in obtaining building data.

The GBCA is able to address these delays by providing extensions as outlined in the Certification Agreement, Clause 11.1, which outlines the Termination of the agreement between the GBCA and the applicant.

The project team must contact their Technical Coordinator to seek an extension. The Technical Coordinator will ask for additional information as to the reason for the extension. The request will be reviewed, and an answer will be provided within 10 working days or as noted below.

For Green Star – Performance

Project teams can seek an extension of the deadline for *Green Star – Performance*.

The extension can be sought for both the initial certification and the yearly audits. The request is subject to distinct approval levels based on the request. Project teams will be required to provide additional submission of energy and water data for the extension period.

Where a change is requested the following applies:

- Extensions of up to 6 months are subject to approval within 10 days by the Green Star Solutions leadership team.
- Extensions over 6 months are subject to a more extensive process. These requests will take longer to process.

No extensions will be granted over 11 months.

For all other rating tools,

Project teams may seek extensions from the GBCA for up to 180 days for the deadlines noted above. Extensions beyond 180 days can be considered by the GBCA under exceptional circumstances and will take longer to process.

Technical Response for Green Star Projects

Green Star - Design & As Built and Green Star – Interiors

The GBCA acknowledges that supply chains and the ability for project teams to collect information may be affected by the short and long term impacts of COVID-19. Where suppliers, contractors or sub-contractors cease to exist a number of credits may be impacted.

Project teams are required to submit a technical question, via the Project Manager portal, and demonstrate the specific cause of the inability to secure documentation. The GBCA will review and provide a ruling per project and per credit, for project teams to use at time of submission.

For example, for the Daylight credit, confirmation from a supplier that a type of glazing was supplied and installed at the As Built phase of the project is unable to be sourced, as the supplier has ceased to exist. In lieu of supplier confirmation, the Head Contractor may provide confirmation that the glazing was installed as per As Built drawings, and correlating the type of glazing installed against the As Built Drawings and Material Data Sheets from the manufacturer.

Green Star – Performance

Buildings or portfolios are still able to achieve Green Star ratings during periods of lower occupancy or building shut down.

Projects currently registered for *Green Star – Performance* will be affected by both short and long term impacts of COVID-19, namely due to lower occupancy rates, partial or complete shutdown of assets. As *Green Star – Performance* rates the operational performance of the building during a performance period, the asset has potential for an artificial improvement due to lower greenhouse gas emissions, potable water consumption and waste diversion. These potential 'improvements' in ratings may have compound affects when looking at Portfolio ratings, projects entering Recertification phases and for projects targeting Carbon Neutral Certification.

The following guidance aims to ensure that shutdowns do not artificially influence the rating, however, this cannot be guaranteed.

For *Green Star – Performance*, all credits are categorised as either a Building, Action, Data or Policy type. A projects ability to respond to each type will be affected between type and phase of project, ie Initial Certification, Audit or Recertification. The following section responds to each of the four types.

Policy Type Credits

The lower occupancy rates, or the shutdown of an asset due to COVID-19 should have no material impact on the project's ability to target policy type credits at Initial or Recertification Periods, as they relate to the processes and policies that apply to the asset.

The Submission Guidelines already provide provisions for Initial Certifications, allowing for the measurement of these conditions for the final three months of the performance period.

For Recertification projects, the required review process of the policy can be demonstrated at any time during the performance period for the recertification period. Where the implementation of the policy is affected due to COVID-19 impacts, the policy must have been approved for implementation for at the least the final three (3) months of the recertification performance period. The following guidance has been provided for policy type credits:

- For Recertification projects - Policies developed within the recertification performance period may be included in a project's submission.

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- Where policies were unable to be implemented in the final (3) months of the recertification performance period, the policy must have been approved for implementation by the building owner or building manager prior to the last three (3) months of the performance period.

Action Type Credits

Project teams may demonstrate that actions have occurred at any stage throughout the performance period, irrespective of periods of lower occupancy or shut down.

Some Action type credits such as Transport Surveys or Occupant Satisfaction surveys may be unable to be conducted due to their reliance on building occupants. For these two credits, surveys conducted out of the performance period may be accepted on the condition they are conducted within three (3) months following the end of the performance period.

Data Type Credits

Data credits will be affected by a building having lower occupancy rates or being shut down due to COVID-19 implications. The impact for Greenhouse Gas Emissions, Potable Water and Operational Waste credits, and their outcomes will be affected by the occupancy of the building and the reliance on benchmarks. Further, these three credits account for approximately a third of the points available in the rating tool.

Due to potential lower occupancy rates or building shut down, it may be expected that the energy and water consumption and waste production will be lower than typical years, and result in an asset having lower greenhouse gas emissions during the performance period. The flow on effect for Climate Active Carbon Neutral Certification may be the requirement for building owners to procure less offsets or LGC's to claim carbon neutral certification for the period affected.

Indoor Environment Quality credits

Indoor Environment Quality (IEQ) credits rely on the monthly measurement of internal environment conditions throughout the performance period, under normal occupancy conditions. IEQ credits are typically targeted at Initial and Recertification phases only.

The Submission Guidelines already provide provisions for Initial Certifications, allowing for the measurement of these conditions for the final three months of the performance period.

The guidance for buildings affected by lower occupancy or shut down is as follows:

- Where monthly measurements are required, gaps related to short term building down turn will be accepted.
- For longer term closures of greater than six (6) months, measurements of at least three (3) months of data for the performance period will be acceptable. The data is not required to be continuous, to allow for potential fluctuation of building operation. If less than three (3) months of data is available, the GBCA will review on a case by case basis, on submission of a technical question.

Greenhouse Gas Emissions

The Greenhouse Gas Emissions credit is required to be submitted at all phases of the project certification – at Initial, Year 1 and 2 Audits and Recertification, and accounts for a significant amount of available points.

Assets with NABERS ratings will continue to be recognised. It is expected that buildings rated under this period will follow NABERS Rulings in regards to COVID-19. For all other pathways, the rating tool already has the ability to account for lower occupancy rates or asset shut down by varying the 'Occupancy Rate' and 'Duration of operation' inputs. The calculator will then adjust both variables

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and benchmarks accordingly. Evidence to support the lower occupancy rates is also required to be provided at time of submission. Refer to the *Greenhouse Gas Emissions Calculator Guide* for more details.

Potable Water

The Potable Water credit is also required to be submitted at all phases of the project certification – at Initial, Year 1 and 2 Audits and Recertification.

Assets with NABERS ratings will continue to be recognised. It is expected that buildings rated under this period will follow NABERS Rulings in regards to COVID-19.

For Pathway 19B - Industry Benchmarks, currently there is no methodology to adjust the occupancy variables in this pathway. As a result, project teams may potentially score higher in this pathway. For longer term shut downs, this could have a considerable impact on achieved points, due to an artificial improvement in points.

At time of publication, the GBCA is exploring options on how to account for this scenario, and will update this document and communicate to industry when a solution is determined. In the interim, please contact the project Technical Coordinator or email greenstar@gbca.org.au, subject line: COVID-19. The GBCA is open to any feedback for this pathway.

For pathways 19C and 19D, the rating tool already has the ability to account for lower occupancy rates or asset shut down by varying the 'Occupancy Rate' and 'Duration of operation' inputs. The calculator will then adjust both variables and benchmarks accordingly. Evidence to support the lower occupancy rates is also required to be provided at time of submission. Refer to the *Potable Water Calculator Guide* for more details.

Waste from Operations

The amount of waste generated is typically linked to occupancy of the building and changes in occupancy are not currently accounted for in any of the available pathways. As a result, project teams may potentially score higher in this credit. For longer term shut downs, this could have a considerable impact on achieved points, due to an artificial improvement in points.

At time of publication, the GBCA is exploring options on how to respond to lower occupancy rates, and will update this document and communicate to industry when a solution is determined. In the interim, please contact the project Technical Coordinator or email greenstar@gbca.org.au, subject line: COVID-19. The GBCA is open to any feedback for this pathway.

Building Type Credits

Building type credits rely on the physical attributes of the building. As such, the impact of lower occupancy rates, partial or complete shutdown is likely to be negligible.

Contacting the GBCA

If you have any questions, or wish to discuss other issues, please contact the Technical Coordinator for your project or email greenstar@gbca.org.au, subject line: COVID-19.

If at any time you believe you are being negatively impacted by the current situation, the guidance in this document, or the service we are providing, and you'd like to speak to a Senior Manager, please contact [Nicole Sullivan](#), Senior Manager Green Star Solutions.

Change Log

Revision Number	Date of Release	Description
1	07/04/2020	Initial Release
