



16 December 2025

Submission to the Department for Infrastructure and Transport

## **Draft Sustainable Government Building Requirements (SGBR) – Industry Review Feedback**

### **Introduction**

The Australian Institute of Architects (the Institute) welcomes the opportunity to provide feedback on the Draft Sustainable Government Building Requirements (SGBR).

The Institute supports the intent of the SGBR to establish a clear and consistent minimum sustainability framework for South Australian Government buildings and to consolidate existing sustainability-related requirements into a single, more coherent policy and delivery mechanism.

As the peak body representing the architectural profession in Australia, the Institute advocates for quality design outcomes that deliver long-term social, environmental, cultural and economic value. The Institute recognises the important role government leadership plays in driving higher standards of sustainability, resilience, design quality and whole-of-life performance across the built environment.

The Institute appreciates the opportunity to contribute at this early stage of the SGBR's development and welcomes continued engagement as the framework progresses, particularly in relation to:

- implementation pathways;
- compliance and verification processes;
- procurement and consultant engagement implications;
- operational feasibility for project teams; and
- alignment with broader state and national sustainability and decarbonisation objectives.

The Institute considers the establishment of clear, achievable and evidence-based sustainability requirements for government projects to be an important step in supporting South Australia's transition toward a lower-carbon, more resilient built environment.

Please refer to the attached Industry Review Feedback Form for the Institute's detailed comments and recommendations.



### **Closing Remarks**

The Institute thanks the Department for Infrastructure and Transport for the opportunity to contribute to this important initiative and looks forward to ongoing collaboration as the Sustainable Government Building Requirements continue to evolve.

Should further clarification or discussion be required in relation to the Institute's feedback, please do not hesitate to contact the undersigned.

Yours sincerely,

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**Craig Glasson**

Executive Leader SA (interim)  
Australian Institute of Architects

**Draft SGBR Review Feedback Form**  
Initial review stage - Proposed requirements content

| Reviewer Details |                        |
|------------------|------------------------|
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| Date Submitted:  | 16-Dec-25              |

| No. | Section Reference (where applicable)  | Sub-Section Reference (where applicable)      | Table Reference (where applicable) | Feedback Type      | Feedback Summary (insert detailed feedback here)   | Reasoning / Justification (insert detail here if required) |
|-----|---------------------------------------|---|------------------------------------|--------------------|--|--|
| 1   | 3 SA Government Minimum Requirements  | 3.1 Leases                                    |                                    | Additional Content | Articulate first preference for existing buildings over new, to reduce embodied carbon and use of new materials. The most sustainable building is the one that already exists.   |  |
| 2   | 3 SA Government Minimum Requirements  | 3.1 Leases                                    |                                    | Additional Content | Articulate requirement for minimising waste, including retaining of any existing fit-outs. Require stronger commitment to circular economy. Refer to GISA (Green Industries SA) and GBICA (Green Building Council of Australia). |  |
| 3   | 3 SA Government Minimum Requirements  | 3.2 New Construction & Refurbishment Projects |                                    | Additional Content | Articulate first preference for existing buildings over new, to reduce embodied carbon and use of new materials. The most sustainable building is the one that already exists.   |  |
| 4   | 3 SA Government Minimum Requirements  | 3.2 New Construction & Refurbishment Projects |                                    | Additional Content | Articulate requirement for minimising waste, including retaining of any existing fit-outs. Require stronger commitment to circular economy. Refer to GISA (Green Industries SA) and GBICA (Green Building Council of Australia). |  |
| 5   | 4 SA Government Detailed Requirements |   | G-1 (Table 8)                      | Additional Content | BSUD targets to be added, referring to Kurring-Monreal agreement   |  |
| 6   | 4 SA Government Detailed Requirements |   | G-2 (Table 8)                      | Additional Content | Net Zero needs to refer to embodied carbon as well. Same for Materials.  |  |
| 7   | 4 SA Government Detailed Requirements |   |                                    | Additional Content | Include reference to first nations engagement under Resilience   |  |
| 8   | 4 SA Government Detailed Requirements |   | E-3 (Table 8)                      | Delete Content     | Air Tightness has low impact on performance compared to impact on embodied carbon. Delete.   |  |
| 9   | 4 SA Government Detailed Requirements |   | E-5 (Table 8)                      | Delete Content     | Suggest to delete the Off Peak requirement. If anything it should be a requirement for grid and battery. Aim higher.   |  |
| 10  | 4 SA Government Detailed Requirements |   | M-2 (Table 8)                      | Additional Content | Set minimum requirement for recycled content. Steel is one of the worst materials for embodied carbon.   |  |
| 11  | 4 SA Government Detailed Requirements |   | M-5 (Table 8)                      | Amend Content      | Level 1 should have the same requirements for circular economy.  |  |
| 12  | 4 SA Government Detailed Requirements |   | M-8 (Table 8)                      | Amend Content      | Should apply to steel and concrete as well, they are the most carbon intensive materials.  |  |
| 13  | 4 SA Government Detailed Requirements |   | W-1 (Table 8)                      | Additional Content | Should include requirements for grey water recycling.  |  |
| 14  | 4 SA Government Detailed Requirements |   | S-1 (Table 8)                      | Amend Content      | Add requirement for data from modeling to be publicly available to help educate and -seers about building performance.   |  |
| 15  | 4 SA Government Detailed Requirements |   |                                    | Additional Content | Suggest to add a requirement for using ISO 15686 as part of Resilience requirements, to encourage transition to Whole of Lifecycle Assessment for project.   |  |
| 16  | 4 SA Government Detailed Requirements |   |                                    |                    |  |  |
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