

# Consultation response – CEEQUAL Version 6

October 2019

## Introduction

A public consultation on the draft technical manual for CEEQUAL Version 6 was held for three weeks between Friday 22 March 2019 and Monday 15 April 2019. Feedback was gathered through an online survey and a series of open consultation workshops in Birmingham, Belfast, London, and Stockholm.

The first issue of CEEQUAL Version 6 for UK & Ireland Projects was released on 27 June 2019. The International Edition was released on 30 September 2019.

We are grateful to everyone who took the time to provide comments during the consultation period. The feedback has improved the quality and practicality of the scheme and is an important part of the update process.

CEEQUAL Version 6 will initially operate for a two-year beta period, with feedback collected as the scheme is used on projects. Updates and refinements to the technical manual, operational processes, and online assessment tool will be evaluated during the beta period and implemented where possible.

For more information on the background and scope of the update, please refer to the consultation information published in March 2019.

This document provides a summary of the feedback received and the actions taken as a result. It records significant changes and responses, but it is not a record of every change made.

## Summary of feedback and responses

A summarised record of the feedback received during the consultation period, along with the outcomes and responses, is provided in Table 1 below.

18 people submitted feedback using the online survey and over 50 people attended consultation workshops. Many of the respondents were either CEEQUAL Assessors, CEEQUAL Verifiers, or BREEAM Assessors. Other respondents included people from client organisations, specialist consultancies, professional bodies, trade bodies, and not-for-profit organisations.

All feedback received has been recorded and reviewed. Comments that have not been addressed in the initial release of CEEQUAL Version 6 have been noted and will inform future updates.

## Further information

Full details of the consultation for CEEQUAL Version 6 can be found at:

<https://www.breeam.com/engage/research-and-development/consultation-engagement/ceequal-v6-consultation/>

Table 1: Summary of feedback received, outcome, and responses

Ref	Category / Topic / Issue	Summary of feedback received	Outcome	Response
1	Technical » Management	The introduction of the ethical labour issue ( <i>1.4 Staff and supply chain governance</i> ) was widely welcomed, although there were some questions regarding the practicality of the draft requirements. Clarification was requested regarding how the requirements apply to projects or project team organisations.	Criteria amended	Amendments have been made to the criteria in <i>1.4 Staff and supply chain governance</i> to clarify how the requirements apply at a project level, increase practicality, and give more emphasis on the construction stage.
2	Technical » Resilience	There was mixed feedback on the newly introduced resilience requirements. Some strongly supported the introduction, while others questioned the inclusion of criteria on risk assessment and future needs. It was felt that the criteria could be clearer, focus more on climate change adaptation, and potentially align further with the EIA topic on major accidents and disasters.	Guidance amended	<p>The resilience of infrastructure assets is considered a sustainability issue that is within the scope of CEEQUAL because the functioning of assets directly affects quality of life.</p> <p>We recognise that there is potential for further emphasising climate change adaptation. We have amended the guidance so that ISO 31000 is now listed as a source of further information rather than a requirement. No other significant changes have been made to the consultation draft, but we have noted the comments on the section and will continue to collect feedback during the beta period and make amendments as required.</p>
3	Technical » Ecology	The feedback was generally positive, with support for a consistent metric-based approach. The use of BS 42040 was questioned by several respondents. Several comments suggested that the requirements do not score highly enough and highlighted that criteria regarding natural capital and ecosystem services are currently missing.	Criteria amended	<p>We have amended 4.5.1 so that long-term management plans may be developed to alternative standards or guidance. Section 11.1 of BS 42020 is recommended where appropriate.</p> <p>We recognise that there is still some overlap between the newly introduced criteria and requirements kept from Version 5. We also recognise that natural capital or ecosystem service approaches are not explicitly rewarded by the current requirements. We will continue to develop the ecology section to address these issues in future updates.</p>

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4	Technical » Resources	<p>The changes introduced to the <i>Resources</i> category were broadly welcomed, with the requirements seen as a good step up from Version 5.</p> <p>Some concerns were raised regarding the need for independent certification to PAS 2080 and the challenge the requirements might present smaller projects.</p> <p>Suggestions were made to reintroduce reward for reducing carbon emissions following the use of LCA and to reduce the difference in scores between different types of LCA.</p> <p>It was felt additional guidance could be added regarding circular economy business models (7.4.1, 7.4.2) and responsible sourcing of non-timber construction products (7.5.2, 7.5.3).</p>	Criteria amended	<p>The criteria in <i>7.2 Reducing whole life carbon emissions</i> have been updated following feedback. We have provided an incremental scoring scale to allow recognition for partial conformity to PAS 2080. We have also separated out the requirement for independent third-party certification and made it possible to scope this out on very low value or short duration projects.</p> <p>We have reintroduced credits for achieving carbon reduction targets, which follows feedback regarding the removal of 8.2.2 in Version 5 and added exemplary level credits for achieving net zero carbon.</p> <p>We have adjusted the distribution of credits in 7.3.1 to reduce the difference in credits available for completing single indicator (carbon) and multi-indicator life cycle assessment.</p> <p>No changes have currently been made to the responsible sourcing criteria (7.5.2 and 7.5.3), which have been maintained from CEEQUAL Version 5. These will continue to be reviewed as part of the BREEAM-wide strategy on responsible sourcing of construction products.</p>

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5	Technical » Transport	<p>The introduced criteria were widely welcomed.</p> <p>It was suggested that CLOCS and FORS could be more prominently referenced and the requirements could go further to promote safety features on construction vehicles, including the potential to align with Direct Vision Standards.</p> <p>There were some concerns that 8.2.4 may be outside of the control of a project team or that a threshold should be introduced to avoid precluding SMEs.</p> <p>It was suggested that additional changes should be made to 8.1.1 and 8.1.2 to further incentivise more sustainable transport modes, including walking, cycling, and public transport.</p>	Guidance amended	<p>Minor updates and corrections have been made to the new criteria and guidance (8.2.3 and 8.2.4).</p> <p>We will monitor the criteria in use and consider further updates in future versions.</p>
6	Technical » Other » Contaminated land	Amendments were suggested to update requirements relating to land contamination specialists and to reflect changes to UK guidance and references.	Criteria and guidance amended	Updates have been made to the criteria and guidance to reflect changes in UK industry practice and guidance, including the inclusion of professionals recognised under the National Quality Mark Scheme for Land Contamination Management (NQMS).
7	Technical » Other » Landscape and visual impact	Several people commented that issues in the <i>Landscape and Historic Environment</i> category could be updated. Suggestions included better alignment with the European Landscape Convention, recognising current industry methodologies, and including guidance on seascape assessments.	Criteria and guidance amended	<p>We have modified 5.1.2 so that the criterion applies to all projects, not just those in areas that are acknowledged or protected for their landscape value, which better aligns with the European Landscape Convention.</p> <p>Added reference to <i>Guidelines for Landscape and Visual Impact Assessment – Third Edition</i> (Landscape Institute / IEMA, 2013).</p> <p>The feedback has been noted and will be considered further during the beta period.</p>

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8	Technical » Other » Communities and stakeholders	The wording regarding local suppliers and contractors in 3.3.4 could be clearer.	Guidance amended	Updated criteria and guidance for 3.3.4 to further emphasise that the criteria do not require <i>appointment</i> of local firms but <i>active encouragement</i> .
9	Technical » Other » Communities and stakeholders	No references to providing social and economic benefits to previously disadvantaged groups (in 3.3. and 3.4).	Noted	The feedback has been noted and will be considered further during the beta period.
10	Technical » Other » Pollution	Could promote/incentivise cleaner plant equipment (e.g. use of batteries and electric plant)	Noted	The feedback has been noted and will be considered further during the beta period.
11	Technical » Other » Water environment	It was noted that there has been a loss of emphasis on the physical and ecological health of the aquatic and marine environment because the 'Water environment' requirements from V5 have been dispersed. It was felt that this weakens the consideration of these issues and isn't consistent with the ambition of the EU Water Framework Directive (WFD).	Noted	Although the Version 5 requirements are still present, we recognise the loss of emphasis on the water environment by removing the distinct category. The feedback has been noted and we will look to strengthen the links to marine and aquatic environments in future updates.
12	General » Project strategy	<p>Feedback was mostly positive, with comments that it is important to consider the strategy of any project and that including the requirements within each issue reduces repetition.</p> <p>Some concerns that the strategic element might not now be as strong or as visible and that the requirements might be avoided.</p> <p>There were also some concerns that smaller projects might be at a disadvantage.</p>	Noted	Making the 'project strategy' criteria a standard part of the assessment is designed to increase use. We have also introduced an optional strategy stage verification point to partially address the loss of a standalone category. The requirements should be applied proportionally to the scale of the project and scoping guidance for smaller projects may be added in the future if required.

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13	General » Strategy stage verification	<p>The introduction of the strategy stage verification point was generally welcomed, although there was some confusion of the extent of the changes made. The greater flexibility and option to complete an earlier verification was felt to be a useful addition.</p> <p>A few suggested that some of the strategy stage questions might need to be reconsidered or that it should be possible to move credits between the strategy stage and design stage verifications.</p>	Content amended	<p>We've updated 'Assessment stages' and 'Verification and certification points', within the 'Scope' section of the technical manual, to clarify the assessment stages and how these relate to typical project stages. We recognise that this is a potential area of confusion and will continue to improve the information and guidance available. These issues are also covered in the Version 6 training for new and existing assessors.</p> <p>It is not currently possible to move credits between strategy stage and design stage verifications using the CEEQUAL Version 6 online assessment tool as this is only likely to affect a small proportion of projects. We will monitor feedback and consider adding this functionality following the beta period.</p>
14	General » Scoring and rating » Outstanding rating	<p>The introduction of an 'Outstanding' rating was welcomed as a way of distinguishing the highest performing projects. Some felt that rating levels should be aligned across BREEAM, CEEQUAL, and HQM.</p> <p>Several commented that the top ratings should be achievable on smaller projects, not just the largest projects.</p>	Noted	<p>In updating the rating levels in CEEQUAL Version 6 we considered alignment with other BREEAM schemes. The lower levels have been aligned in CEEQUAL Version 6 and greater consistency may be achievable in future versions. We have tried to ensure all rating levels are achievable regardless of the project type or scale.</p>
15	General » Scoring and rating » Minimum standards	<p>The introduction of minimum standards was generally supported, although there was some confusion regarding how they would work for different assessment types or project types. Some felt that more minimum standards should be introduced at lower rating levels.</p>	Noted	<p>The 'Minimum standards' section has been amended slightly for clarity. The topic is also covered in the Version 6 training material for new and existing assessors. Additional minimum standards will be considered at the end of the beta period.</p>

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16	General » Innovation credits	There was mixed feedback on the introduction of innovation credits. Some welcomed and supported the introduction recognising that it could incentivise novel approaches. Some raised concerns over how the innovation would be evaluated and whether there would be any sustainability benefit.	Noted	We will monitor the uptake and use of innovation credit applications over the beta period. Applications will be evaluated using the same peer-review process that has been successfully used in BREEAM building schemes for several years. The peer-review process will use expertise from across the infrastructure sector.
17	General » Scope	More clarity requested on project types that could be classified as buildings or infrastructure.	Noted	We recognise that there are likely to be many different situations and are happy to advise on specific cases. We will amend the guidance if similar situations frequently reoccur.
18	General » Smaller projects	Concerns that the new criteria increased the complexity of the scheme and would be difficult to achieve on smaller projects.	Noted	Ensuring that the scheme is suitable for a full range of project types and sizes is an ongoing consideration. We have tried to ensure the scheme is stretching without being inaccessible to smaller projects. We have limited the scale and nature of the changes to help with this. We will monitor the scheme in-use and this will remain a consideration for future updates.
19	General » Scoring and weightings	A few comments were received that weightings do not adequately reflect scientific priorities or risks, including that <i>Management</i> is too high and <i>Land use and ecology</i> too low. Suggestions to increase <i>Energy and carbon</i> , <i>Land use and ecology</i> and reduce <i>Community and stakeholders</i> , <i>Resilience</i> , <i>Management</i> . Suggestion for new, independent weighting exercise.  It was also suggested that the distribution of credits is too wide and that too many questions are included within the scheme.	Noted	Weightings will be reviewed in the future as part of a BREEAM-wide review. The number of questions and the distribution of credits will be reviewed during the beta and reconsidered for future versions. Further changes were outside of the scope of this update.

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20	General » Format, layout, language	<p>There was generally a preference for the Version 5 layout (with all information regarding each question/criterion grouped together), although some acknowledged that the preference may be based on familiarity. The introduction of a Definitions section was felt to be useful.</p> <p>Several requests for more consistent use of terminology, including project roles and project or assessment stages. Several comments also suggested that the readability of the new elements could be improved and suggested using more plain English throughout the manual.</p>	Noted	<p>Several aspects of the formatting in the consultation draft have been corrected or updated. We are planning to release online versions of the manual in the future and will continue to improve the format and usability of a print version alongside this.</p> <p>We recognise that there are currently inconsistencies in how some terms are used throughout the manual, particularly regarding project stages and project team members. We will be reviewing this throughout the beta period.</p>