



Australian **Built** Environment

Communications Report

Navigating Sustainability Claims
in an Era of Scrutiny

March **2026**



Executive Summary

The Australian built environment sector stands at a critical juncture. As regulatory enforcement intensifies and stakeholder expectations evolve, the challenge of communicating sustainability credentials has never been more complex. It's also never been more consequential.

This report, informed by an industry roundtable convened by the Anti-Greenwash Charter in late 2025, captures the candid perspectives of architects, government advisors, sustainability consultants, product manufacturers, and industry advocates grappling with these challenges daily.

Five **Critical** Findings

1. The Ambition Paradox is Universal

Every organisation faces the same tension: pressure to demonstrate leadership in sustainability conflicts with the requirement for fully substantiated, defensible claims. This creates a paralysis where organisations either over-promise or fall silent entirely.

2. Greenwashing Pervades the Development Pipeline

From design intent to construction delivery, misleading claims appear at every stage. One participant suggested that beyond top-tier developers, a majority of applications may involve some degree of greenwashing. While anecdotal, it reflects a broader concern that exaggeration is becoming embedded in the sector.

3. Architects Are Master Storytellers (For Better and Worse)

Architects create compelling narratives that inspire clients and win projects, but these stories often detach from deliverable reality. The gap between design intent and built performance remains a fundamental credibility challenge, exacerbated by architects' limited involvement in post-occupancy outcomes.

4. The Industry Lacks Reliable Infrastructure

There is no ecosystem of trusted third-party certification schemes, no standardised language, and no consistent consequences for false claims. Specifiers face time pressures and product complexity without reliable tools to distinguish genuine credentials from greenwashing.

5. Greenhushing is the New Risk

Fear of regulatory action is driving organisations towards silence rather than improved communication. This "greenhushing" phenomenon threatens to eliminate transparency entirely, depriving the market of the information needed to drive genuine progress.

The Path Forward

Credible sustainability communication requires action at three levels:

- ✔ Individual organisations must audit current claims, strengthen approval processes, and build cross-functional capability to ensure every public statement can withstand scrutiny.
- ✔ The industry collectively needs common standards, shared definitions, and reliable certification infrastructure that reduces the burden on individual specifiers while raising overall credibility.
- ✔ Regulators and government should provide sector-specific guidance, lead by example in procurement and policy, and ensure enforcement is proportionate and educational rather than purely punitive.

The opportunity before the Australian built environment sector is clear: those who embrace radical transparency and credible communication now will establish competitive advantage as the market increasingly penalises greenwashing. The alternative, a continued erosion of trust, threatens the sector's social license and its ability to deliver the sustainable built environment Australia needs and desires.

1. Introduction: A Critical Moment

The Convergence

Three forces are reshaping how the Australian built environment sector communicates sustainability.

First, Regulatory enforcement is intensifying.

The Australian Competition and Consumer Commission (ACCC) and the Australian Securities and Investments Commission (ASIC) have made environmental and sustainability claims a top enforcement priority. A few notable examples have been a \$13 million penalty against investment firm Vanguard, \$11 million penalty against the Mercer Superfund, as well as energy giants Santos and Woodside being hauled to Federal Court for making false environmental claims. In May 2025, Energy Australia was made to admit its carbon neutral claims were false and apologise to nearly half a million customers. In many ways, Australia now leads the world in greenwashing enforcement.

Second, Technical complexity is exploding.

There are now more than 600 different reporting frameworks and standards. Along with this, embodied carbon reporting requirements are emerging across jurisdictions and lifecycle assessment expectations are expanding. The volume and sophistication of sustainability data have grown exponentially, but the tools to communicate this information credibly have not kept pace.

Third, Stakeholder expectations are evolving.

Investors demand substantiated ESG credentials. Clients expect meaningful sustainability outcomes. The public increasingly scrutinises environmental claims. Yet the regulatory crackdown has also created an unintended consequence: “greenhushing,” where organisations communicate less about their sustainability work for fear of getting it wrong.

Together, these forces are creating what one roundtable participant described as a perfect storm, where the stakes for credible communication have never been higher, and the path forward has never been less clear.

Why This Report Matters

In late 2025, the Anti-Greenwash Charter convened senior leaders from across the Australian built environment sector for a frank discussion about communication challenges. The participants, representing architecture practices, government architect offices, industry associations, sustainability consultancies, and product manufacturers, brought decades of combined experience and a willingness to speak candidly about what's working and what isn't.

Their insights, captured in this report, reveal an industry grappling with several fundamental questions.

- How do we balance ambition with defensibility?
- How do we translate technical complexity into meaningful communication?
- How do we verify claims that depend on dozens of parties across a supply chain?
- How do we maintain integrity in a commercial environment that often rewards exaggeration?
- How do we communicate this with an increasingly wary public?

This report does not offer easy answers. Instead, it provides an honest assessment of where the sector stands, identifies the most critical challenges, and proposes practical pathways towards more credible communication.



About This Report

This report draws on:

- ✔ A 90-minute industry roundtable with diverse sector representation
- ✔ Analysis of current regulatory guidance and enforcement actions
- ✔ Review of Australian and international best practices
- ✔ Synthesis of emerging challenges around embodied carbon and technical disclosure

The roundtable operated under Chatham House rules to encourage candour. All insights are presented without attribution to specific individuals or organisations unless participants have explicitly consented to be named.

The Anti-Greenwash Charter's Role

The Anti-Greenwash Charter is a not-for-profit initiative promoting organisations committed to responsible sustainability communications. Originally focused on the UK built environment sector, the Charter has expanded to Australia in recognition of the unique challenges and opportunities in this market.

The Charter does not claim to have all the answers. Rather, it serves as a convener, facilitator, and resource for organisations seeking to navigate the complex terrain of credible sustainability communication. This report represents the first step in building a community of practice focused on transparency, accuracy, and accountability in the Australian built environment.

2. The Regulatory Reality

The ACCC's guidance on environmental claims establishes five core principles that apply directly to the built environment sector.



Accurate and Truthful.

Claims must reflect verifiable facts. "Eco-friendly," "green," and "sustainable" without qualification are considered vague and potentially misleading. Specific, measurable statements are required.



Clear and Transparent.

Language must be precise. Consumers (which includes B2B clients in the built environment) must understand exactly what is being claimed without needing to decode technical jargon or hunt for caveats.



Evidence-Based.

Organisations must be able to produce documentation substantiating every claim. "We aim to" or "our goal is" language may still require evidence of concrete steps and reasonable likelihood of achievement.



Appropriately Contextualised.

Comparative claims like "30% less carbon" require clear baselines and scope boundaries. Achievements must be presented relative to meaningful benchmarks, not industry-worst performers.



Current and Relevant.

Forward-looking statements must be regularly updated to reflect progress or barriers. Past achievements cannot be presented as ongoing practices if circumstances have changed.

ASIC's focus complements the ACCC's by targeting sustainability claims in financial disclosure and investment products. For developers, property funds, and REITs, this means marketing materials and investor communications face heightened scrutiny. ASIC examines whether ESG-labelled products deliver genuine sustainability outcomes or merely package conventional offerings with green branding.



Common Compliance Pitfalls in the Built Environment

Roundtable participants identified several recurring vulnerabilities.

Implied Performance vs. Actual Outcomes.

Architectural renders showing lush vegetation, natural ventilation, and solar panels create expectations that may not survive value engineering or operational realities. One participant noted: “We fall for the allure of intelligent arrows on drawings without the science-based feedback loop.”

Design Intent vs. Built Reality.

“Designed for 6-star energy rating” differs substantially from “achieved 6-star rating.” Yet marketing materials frequently blur this distinction. The pressure to win projects encourages aspirational communication that later proves undeliverable.

Selective Disclosure.

Highlighting sustainable elements while omitting material impacts creates misleading impressions. A building may showcase its timber structure while remaining silent on the embodied carbon of its concrete podium or advertise rooftop solar while relying heavily on grid power.

Unsubstantiated Lifecycle Claims.

“Circular economy” and “cradle-to-cradle” terminology appears frequently in development applications and product marketing, but rigorous lifecycle assessment backing these claims is often absent. As one government architect observed, these terms have become “fluffy language” detached from measurable outcomes.

The Australian Context: Where Enforcement is Heading

Australia's regulatory approach to greenwashing has evolved rapidly. Unlike some jurisdictions that rely primarily on industry self-regulation, Australian regulators have demonstrated willingness to pursue enforcement actions and impose substantial penalties. The ACCC's 2024-2025 focus on environmental claims reflects growing consumer awareness and political pressure to address misleading sustainability marketing. This enforcement extends beyond consumer products to business-to-business claims, including development applications, tender submissions, and project marketing.

But there are still several factors that may intensify risk specifically for the Australian market.

Patchwork Regulation.

Each state and territory maintains distinct planning, environmental, and building requirements. Organisations operating nationally must navigate varying disclosure expectations and standards. This complexity creates opportunities for confusion and for claims that satisfy one jurisdiction's norms but violate another's rules.

Emerging Embodied Carbon Requirements.

New South Wales has introduced embodied carbon reporting for government buildings. Other jurisdictions are developing similar frameworks. These requirements will expand the volume of sustainability data in the public domain and the opportunities for inconsistency or exaggeration in how that data is communicated.

Post-Occupancy Performance Gaps.

International experience, particularly in the UK, demonstrates that many "greenest buildings" fail to perform as designed. Australia has been slower to implement systematic post-occupancy evaluation, but pressure is building. One government participant noted advocacy for requirements proving energy and water credentials two years after occupation. Such verification would expose discrepancies between promised and delivered performance.

What Industry Told Us

The regulatory landscape creates genuine challenges for practitioners, some of which were raised during our discussions.

“The ambiguity is the hardest part.”

General principles are clear, but application to complex, multi-party projects with long delivery timelines and performance uncertainties remains unclear. Organisations want to know exactly how much evidence is enough, what qualifications are required, and where the line is between aspiration and unsubstantiated claims.

“We need sector-specific guidance.”

Generic greenwashing principles don't address built environment realities: collaborative delivery involving dozens of parties, performance variables dependent on tenant behaviour and operational decisions, embodied carbon calculations with inherent methodological uncertainty, and supply chain data gaps.

“Enforcement feels arbitrary.”

Without clear safe harbours or worked examples, organisations fear that claims deemed acceptable today could trigger enforcement tomorrow. This uncertainty drives conservative behaviour or, even worse, silence.

One roundtable participant from a government architect's office reported developing methods to help planners “interrogate sustainability claims better because the field is awash with false claims.” This acknowledgment that greenwashing has become normalised, particularly outside top-tier developers, reveals the scale of the credibility crisis.

3. Five Critical Communication Challenges

Challenge 1

The Ambition vs. Defensibility Paradox

Every organisation in the built environment faces irreconcilable pressures. Commercial imperatives demand demonstrating leadership as clients seek partners pushing sustainability boundaries. Industry recognition goes to bold commitments and media coverage amplifies ambitious targets. Talent, too, gravitates towards organisations with strong sustainability credentials.

Simultaneously, regulatory requirements demand complete substantiation. Legal teams counsel extreme caution while compliance functions push for qualification and caveat. The risk of reputational damage or enforcement action looms over every public statement. This creates what one participant called the “damned if we do, damned if we don’t” paradox. Ambitious communication attracts scrutiny and potential enforcement, while conservative communication sacrifices competitive advantage and stakeholder engagement.

Depending on the sub-sector, this can manifest itself in several ways.

✔ Architecture Practices

may win projects by showcasing sustainability innovation, then struggle when client budget constraints or value engineering eliminate the features that justified those claims. One architect described pitching advanced waterproofing systems only to have developers substitute cheaper alternatives known to fail outside liability periods, then still marketing the development using the original sustainability narrative.

✔ Developers

make portfolio-level sustainability commitments without certainty that every project can deliver. One roundtable participant noted that major developers increasingly include sustainability claims in tender submissions and investor materials, but delivery mechanisms remain unclear. The gap between corporate commitment and project-level achievement creates ongoing tension.

✔ Government stakeholders

face political pressure to demonstrate environmental leadership while managing budget constraints and procurement realities that limit sustainable options. As one participant observed, “design excellence” is often misused politically to argue against necessary costs, creating tension between ambitious public commitments and conservative delivery.

Risk tolerance also varies dramatically within organisations, making the paradox even more acute. Marketing teams prioritise competitive positioning. Sustainability teams want to showcase genuine achievements. Legal teams demand documentation and qualification. Leadership balances commercial opportunity against reputational protection. One participant described the “marketing-sustainability-legal triangle” where each function pulls in different directions, often without clear decision-making authority or shared understanding of acceptable risk levels.

This internal friction can create:



Lengthy approval cycles that delay communications and miss market opportunities



Inconsistent messaging across channels as different teams assert control



Passive-aggressive dynamics where sustainability achievements go uncommunicated because legal teams won't approve proposed language

But increasingly, the ambition-defensibility paradox resolves towards silence. Organisations doing genuine sustainability work choose not to communicate it rather than navigate regulatory uncertainty. Several roundtable participants reported reducing external sustainability communications over the past 12-18 months. The risk-reward calculation has shifted as the reputational upside of sustainability leadership no longer justifies the potential downside of regulatory scrutiny or public criticism.

This “greenhushing” phenomenon threatens market transparency. If organisations achieving genuine progress remain silent while those making exaggerated claims continue communicating, the market loses its ability to distinguish leaders from laggards. Information asymmetry increases, and the credibility crisis deepens.



Challenge 2

Technical Translation

The built environment sector now generates unprecedented volumes of sustainability data. From embodied carbon calculations to lifecycle assessments, water usage modelling, material health declarations, and energy performance simulations, it's clear there's been an explosion in what gets publicly reported. Yet this data explosion creates communication challenges at every level.

Technical specialists understand the methodologies and limitations while project teams have just enough information to make decisions. Clients want meaningful comparisons, investors require standardised disclosures, and the public expects accessible explanations.

No single communication approach satisfies all audiences. Yet resource constraints prevent organisations from developing customised messaging for each stakeholder group. The default becomes either oversimplified marketing language that borders on misleading or technical documentation that overwhelms non-specialist audiences.

Making Embodied Carbon Meaningful

Embodied carbon emerged as a particular pain point in roundtable discussions. New reporting requirements mean more organisations must communicate this data, but few have developed effective approaches.

Several challenges came up during discussions.

Methodological Complexity.

Lifecycle assessment involves hundreds of assumptions about material sourcing, manufacturing processes, transportation, construction methods, building lifespan, maintenance cycles, and end-of-life scenarios. Results vary significantly based on methodology choices and system boundaries. Communicating this uncertainty without undermining the value of the data can prove difficult.

Lack of Intuitive Context.

“3,500 tonnes CO₂e” means little to most audiences. Translating this into meaningful comparisons (equivalent to X cars or Y flights) risks oversimplification. Benchmarking against industry averages requires standardised baselines that don't yet exist.

Data Quality Variations.

Some materials have rigorous Environmental Product Declarations (EPDs) while others rely on generic database values. The reliability of embodied carbon calculations depends on data quality that varies across the supply chain, but communicating this nuance is complex.

Embodied carbon assessment methodologies continue evolving, causing even more consternation. What constitutes best practice today may be superseded tomorrow. Organisations struggle to communicate current performance while acknowledging future requirements may differ.

One participant emphasised: “It's easy to be seduced by products with accreditations or declarations” without understanding what those certifications actually measure or guarantee. The embodied carbon space remains immature, creating opportunities for misleading communication even from well-intentioned organisations.

The pressure to make technical information accessible creates constant tension. Simplify too much, and claims become misleading. Simplify too little, and communications fail to connect with audiences.

Participants shared examples of problematic oversimplification:

“Carbon neutral building” claims that ignore embodied carbon or rely on questionable offsets

“Net zero energy” assertions based on modelled rather than measured performance

“100% renewable energy” communications that omit grid-supplied backup power

The alternative, exhaustive technical documentation, proves equally problematic. One participant noted that Sustainability Management Plans often contain disclaimers and qualifications that render them nearly meaningless, protecting organisations legally while providing little useful information to decision-makers.

The roundtable identified few examples of effective middle ground:

communications that meaningfully inform while remaining defensible under regulatory scrutiny. Some participants raised certification schemes as a potential middle ground to bridge communication gaps. Green Star, NABERS, and other rating schemes provide standardised frameworks that simplify communication. A “6 Star Green Star” rating signals quality without requiring audiences to understand underlying metrics.

However, participants noted several limitations:



Varying Recognition.

Scheme familiarity differs across audiences. Investors may understand Green Star; the general public may not. International clients may prioritize LEED or BREEAM. This requires organisations to maintain multiple certifications or provide extensive explanation.



Incomplete Coverage.

Certification addresses specific sustainability dimensions but not others. A building may achieve high energy performance ratings while having significant embodied carbon impacts. Communicating certification achievements without implying comprehensive sustainability credentials requires nuance.



Certification Without Performance.

Certification addresses specific sustainability dimensions but not others. A building may achieve high energy performance ratings while having significant embodied carbon impacts. Communicating certification achievements without implying comprehensive sustainability credentials requires nuance.

Ultimately, the roundtable consensus was that certification schemes play valuable roles but cannot substitute for honest, context-appropriate communication about what has actually been achieved and what uncertainties remain.

Challenge 3

Value Chain Visibility

Built environment projects involve dozens or hundreds of organisations and stakeholders. Sustainability claims at any point in this chain depend on information and actions from multiple other parties. An architect's embodied carbon calculation relies on supplier-provided EPDs. A developer's net zero commitment depends on tenant energy practices. A product manufacturer's recycled content claim depends on waste stream availability.

This interdependency creates verification challenges. As one participant noted: "We can only be as credible as our supply chain." Yet organisations typically lack direct visibility into suppliers' processes, contractors' execution, or end-users' behaviours. That leads to several systemic information gaps.

Upstream.

Suppliers provide varying levels of documentation. Some offer detailed EPDs and lifecycle data while others provide minimal information or unverifiable marketing claims. Architects and specifiers make decisions under time pressure without resources to thoroughly investigate product credentials.

During Construction.

Value engineering and substitution occur regularly. Materials specified for sustainability attributes may be replaced with cheaper alternatives. Documentation of these changes often lags or doesn't occur, creating discrepancies between design intent and as-built conditions.

Operational.

Building performance data remains largely opaque. Even when monitoring systems exist, data may not be shared beyond facility managers. Tenants receive little feedback on their environmental impacts. This information asymmetry prevents verification of operational claims and limits learning.

How organisations thus verify sustainability information can be quite problematic. Many noted sustainability claims throughout the built environment sector rest on foundations of unverified or partially verified information from multiple parties, each making their own assumptions and facing their own pressures.

Many participants acknowledged accepting supplier claims at face value due to time and resource constraints. Third-party certification provides some assurance, but participants noted that products with EPDs or environmental labels are not necessarily the lowest-impact options available. They're simply the ones with documentation.

Contractual relationships often include warranties or representations about product characteristics, but enforcement mechanisms remain unclear. One participant described developers using "reliance documents" to shift responsibility away from themselves, creating chains of liability that obscure accountability.

One participant captured the challenge succinctly: sharing the supply chain means sharing reputational risk. An architect's sustainability credentials can be undermined by a contractor's substitution. A developer's net-zero commitment can be derailed by tenant energy practices. A manufacturer's circular economy claim can fail if waste collection infrastructure doesn't materialise.

Yet organisations have limited control over these downstream outcomes. This creates difficult choices: claim only what you directly control (dramatically limiting sustainability communications), attempt to control the entire value chain (often impractical and expensive), or make broader claims while accepting risk from partners' performance (the current norm, with attendant greenwashing exposure).

The roundtable, unfortunately, revealed no consensus on best practices for navigating these trade-offs.

Challenge 4

Internal Governance

Who owns sustainability communications? Organisational responsibility for sustainability messaging typically fragments across multiple functions.



Marketing/Communications.

Develop external messaging and manage brand reputation. This team often prioritises competitive positioning and stakeholder engagement over technical accuracy.



Sustainability/ESG Teams.

Generate technical content and track performance metrics. They typically prioritise accuracy and comprehensive disclosure over accessibility and commercial impact.



Legal/Compliance.

Review claims for regulatory and liability risk but often prioritise risk mitigation over transparent communication.



Project Delivery.

Possess detailed knowledge of actual performance and constraints but are rarely involved in external communications decisions.



Leadership.

Make strategic decisions about sustainability commitments but may have limited involvement in operational communications.

This fragmentation creates coordination challenges. Sustainability achievements may go uncommunicated because marketing teams lack technical understanding. Technical teams may generate documentation that never reaches external audiences. Legal teams may block communications that sustainability teams consider important for transparency.

Further complicating matters are approval processes that may create bottlenecks. A chief concern are approval processes put in place to combat greenwashing. What previously required sign-off from marketing now involves sustainability, legal, and sometimes executive review.

These enhanced processes serve important quality control functions. They catch unsupported claims, identify missing caveats, and ensure consistency across channels. Participants acknowledged that careful review has prevented problematic communications. But it certainly doesn't make work easier, nor does it help with messaging. Businesses can miss time-sensitive opportunities, multiple rounds of revision can dilute messaging into meaningless generalities, and inconsistent standards mean different reviewers may require different changes. One participant noted: "By the time legal is comfortable with the language, it's so hedged and qualified that it says nothing meaningful."

The challenge is to find the balance between necessary rigour and productive output. Few participants felt their organisations had yet achieved this balance.

Additionally, the roundtable identified several capability deficits that complicate credible communication.

Technical Sustainability Literacy.

Marketing and communications professionals often lack deep understanding of sustainability methodologies, making it difficult to translate technical information accurately. Conversely, sustainability professionals may lack communication skills to make technical content accessible.

Regulatory Knowledge.

Few organisations have staff combining sustainability expertise with regulatory and legal literacy. Understanding both what constitutes genuine environmental performance and what regulatory standards require remains rare.

Verification and Documentation.

Even well-intentioned organisations struggle with evidence management. Knowing what documentation to maintain, how to organise it for future retrieval, and how to present it if challenged requires systematic approaches few organisations have developed.

Participants noted that these capability gaps create dependency on external consultants, particularly Environmentally Sustainable Design engineers. One observed that Australian practices rely more heavily on consultants compared to international peers with in-house expertise. This creates distance between design teams and sustainability credentials, increasing miscommunication risk.



Challenge 5

The Collaboration Deficit

Participants acknowledged tension between competitive dynamics and collective interest in credible communication. Organisations achieving genuine sustainability leadership want recognition for their efforts. This creates incentives to differentiate through bold claims. Meanwhile, organisations struggling to meet basic standards have incentives to exaggerate to appear competitive.

This creates a dynamic not dissimilar to the tragedy of the commons: if everyone could agree to honest communication and standardised metrics, the entire sector would benefit from increased credibility. But individual organisations face pressure to bend rules for competitive advantage, undermining collective trust.

One participant noted: “We’re all reinventing the wheel separately” when shared resources and common standards would serve everyone better. However, few mechanisms exist for developing and enforcing industry-wide standards in a fragmented, competitive market.

The Australian built environment sector lacks agreed definitions for even fundamental sustainability concepts. “Carbon neutral,” “net zero,” “circular economy,” “sustainable,” and dozens of other terms mean different things to different organisations. This definitional inconsistency creates confusion and enables greenwashing. Organisations use favourable interpretations while technically complying with someone’s definition of the term. Comparisons become meaningless when organisations measure different things using the same labels.

Roundtable participants also valued the opportunity to discuss challenges with peers. Several noted that such conversations rarely occur in other contexts. Competitive sensitivities often limit transparency about what works and what doesn’t. Failures go unshared, preventing collective learning. Successes remain proprietary advantages rather than becoming shared practices. This knowledge isolation means every organisation confronts similar challenges independently, often making similar mistakes. Opportunities to build on others’ experience are lost.

Participants called for more forums like the roundtable, including settings where practitioners can share experiences candidly without commercial consequences, building collective knowledge about effective approaches and common pitfalls.

Most notably, the strongest message across roundtable discussions called for industry-wide standardisation and reliable infrastructure to reduce the burden on individual organisations while improving overall credibility.

This infrastructure would include:

Trusted Third-Party Certification:

Schemes that specifiers and decision-makers can rely on without becoming experts in every technical detail. One participant articulated the vision: “an ecosystem of reliable third-party certification schemes that players can trust.”

Standardised Data and Methodologies:

Common approaches to embodied carbon calculation, energy modelling, lifecycle assessment, and other technical analyses that enable meaningful comparison and reduce opportunities for gaming.

Clear Regulatory Safe Harbours:

Guidance on what constitutes compliant communication, including worked examples specific to built environment scenarios. This would provide confidence that following established protocols protects against enforcement risk.

Consequences for Non-Compliance:

Several participants noted that the construction industry operates on a culture of “whatever you can get away with.” Meaningful consequences, whether regulatory penalties, professional sanctions, or legal liability, are necessary to shift behaviour towards credibility.

Government Leadership:

Consistent application of high (though not necessarily excellent) standards in government procurement and policy. One participant emphasised that government should “lead by applying a good standard,” setting market expectations through its own practices.

Without this infrastructure, individual organisations bear impossible burdens. Each must verify every supply chain claim, develop comprehensive internal standards, navigate regulatory uncertainty, and educate every stakeholder about technical complexity. With proper infrastructure, these burdens distribute across the sector, making credible communication achievable at scale.



4. What Good Looks Like

Despite the challenges, certain principles emerged from roundtable discussions and international best practices that demonstrate foundations for strong, credible communications.

Most important is **accuracy** and the **substantiation** of claims. Every statement about sustainability performance should rest on documented evidence. If you cannot produce verification when challenged, don't make the claim. This requires rigorous data management and clear lines of evidence. Accuracy also means being specific rather than vague. Replace "eco-friendly" with measurable attributes. Replace "sustainable" with specific dimensions of sustainability being addressed. Replace aspirational language with concrete commitments backed by implementation pathways.

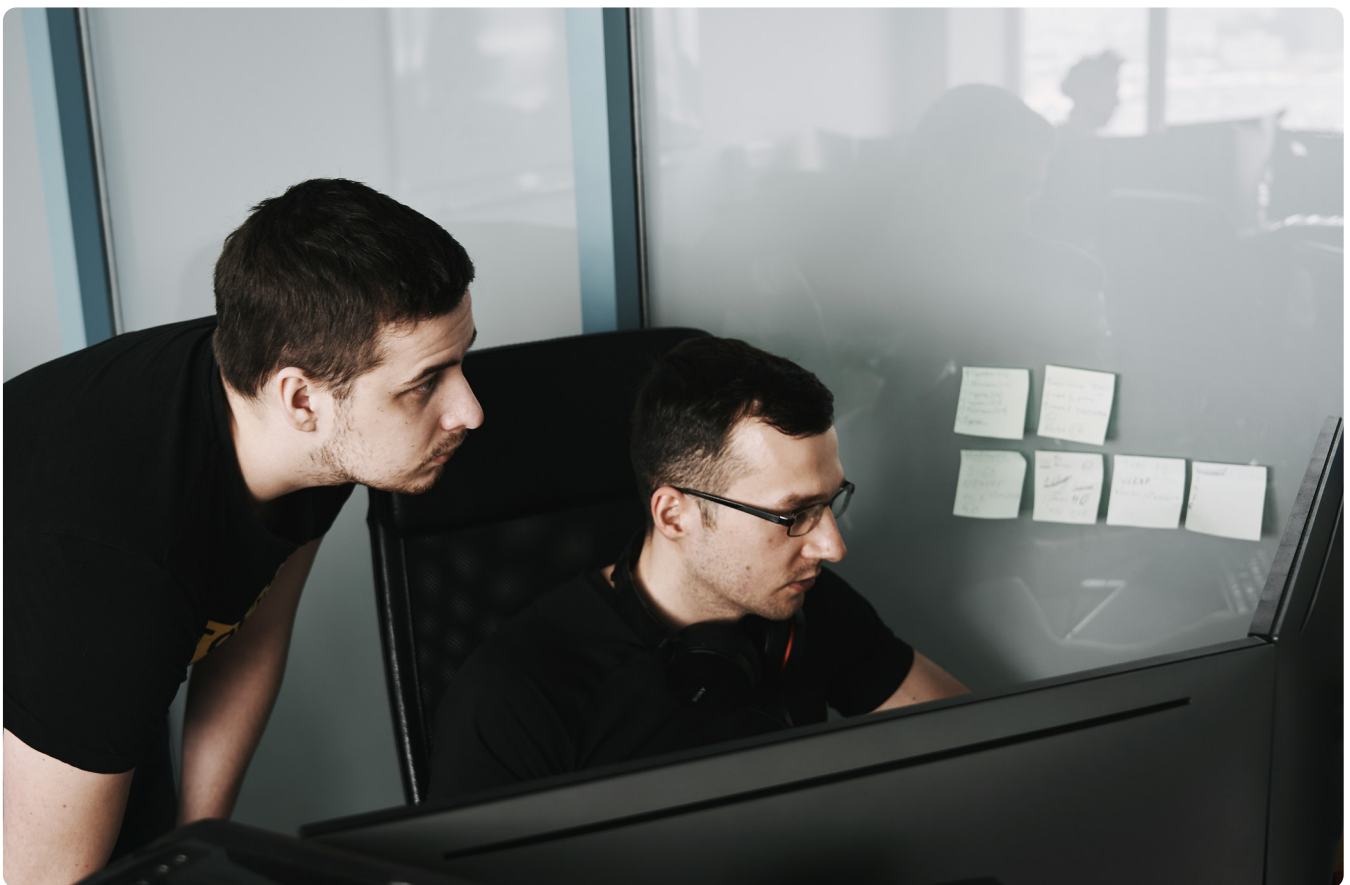
Language must be **precise, understandable, and clear**. Communications should use language appropriate to the audience while maintaining precision. This requires testing. If your intended audience consistently misunderstands, the communication has failed regardless of how technically correct it may be. Clarity also requires distinguishing between different types of claims rather than using universal language. These distinctions matter to regulatory compliance and stakeholder trust.

Context should make comparisons and benchmarks easier to understand as performance metrics require context to be meaningful. Claiming "30% less embodied carbon" needs a clearly stated baseline to make sense. Being "best in class" requires defining the class and the criteria for comparison. Context also means acknowledging what is not being claimed. If sustainability credentials focus on operational energy, be clear that embodied carbon is not addressed. If circular economy language refers to design principles rather than established end-of-life pathways, state this explicitly.

Evidence should be **easily verifiable** for anyone wanting to check your claims. This means providing clear documentation, transparent methodologies, and accessible data. It also means being willing to explain assumptions and limitations when questioned. Accessibility does not require publishing every detail publicly, but it does require maintaining evidence that can be produced if challenged.

Finally, it's important to acknowledge one's **barriers, limitations**, and uncertainties. No building is perfectly sustainable. Every project involves trade-offs. Technical analyses include assumptions and uncertainties. Honest communication acknowledges these limitations rather than presenting idealised narratives. One participant advocated for "radical transparency," putting all cards on the table, good and bad. This includes discussing barriers to achieving sustainability goals, acknowledging where knowledge is incomplete, and being honest about failures alongside successes.

As another participant emphasised: "stakeholders do not expect perfection, but they do demand honesty."



5. Recommendations:

The Path Forward

Rather than a broadly applicable panacea of solutions, the path forward requires tailored action for individual organisations, the sector, as well as government and regulators.

For Individual Organisations

Immediate Actions (0-6 months)



1. Conduct Communications Audit

Review all current sustainability communications (e.g. website, marketing materials, tender responses, investor reports, social media) against ACCC and ASIC guidance. Identify high-risk claims that lack adequate substantiation, use vague language, or could mislead even if technically accurate.

From there, create an inventory of every public sustainability claim your organisation makes. For each claim, document: the evidence supporting it, any assumptions or qualifications necessary, who approved it, and when it was last verified.



2. Establish or Strengthen Approval Processes

Define clear responsibility for sustainability communications. Who reviews claims for technical accuracy? Who assesses regulatory risk? Who has final approval authority? What documentation is required at each stage?

Implement a standard review protocol that balances rigour with efficiency. Define clear criteria for what requires full legal review versus standard approval. Establish response time commitments to avoid extended delays.



3. Identify and Address High-Risk Messaging

Prioritise revision of claims using vague terminology (“eco-friendly,” “sustainable,” “green”) without specific substantiation. Update forward-looking statements to ensure pathways and progress are documented. Remove or qualify comparative claims lacking clear baselines.

Pay particular attention to design-phase communications that may over-promise operational performance. Implement clear language distinguishing design intent from delivered outcomes.



4. Document Evidence for All Claims

Implement systematic evidence management. For every sustainability claim, maintain documentation showing: source data, calculation methodologies, assumptions made, verification steps taken, dates of assessment, and responsible parties.

Organise this evidence for rapid retrieval if challenged. Assume that any claim may need substantiation months or years after being made.



5. Provide Internal Training

Ensure that everyone involved in external communications understands greenwashing risks and regulatory requirements. This includes marketing teams, business development staff, project managers, sustainability leads, and leadership.

Training should cover: what constitutes greenwashing, common pitfalls in built environment communications, internal approval processes, and how to translate technical information credibly.

Medium-Term Priorities (6-18 months)



1. Build Cross-Functional Communication Capability

Address the “marketing-sustainability-legal triangle” by developing shared understanding across functions. Create regular forums where these teams discuss challenges and align on approach. Consider dedicated roles bridging technical and communication expertise.

Invest in capability development: communication training for technical staff, sustainability literacy for marketing teams, built environment context for legal reviewers.



2. Strengthen Value Chain Data Collection

Develop systematic approaches to gathering and verifying sustainability information from suppliers, contractors, and partners. This may include: standard information requests, contract terms requiring documentation, audit protocols for key claims, and relationships with suppliers committed to transparency.

Recognise that strengthening value chain visibility requires investment in relationships and processes, not just contractual terms.



3. Develop Audience-Specific Communication Strategies

Rather than one-size-fits-all sustainability communications, develop tailored approaches for different stakeholders: technical documentation for specifiers, investor-focused ESG disclosures, accessible explanations for media and the public, project-specific performance reporting for clients.

Each audience requires different information at different levels of detail. Strategic communications acknowledge these differences while maintaining consistency of underlying facts.



4. Create Internal Guidelines and Templates

Develop organisation-specific guidance on acceptable sustainability communications. This might include: approved terminology and phrases, required qualifications for different claim types, standard documentation requirements, examples of compliant language, and escalation protocols.

Templates for common communication needs (project descriptions, capability statements, ESG reports) can embed best practices and reduce risk of inconsistent messaging.



5. Implement Regular Review and Update Cycles

Sustainability performance evolves. Regulatory expectations change. Communications require regular review to ensure they remain current and accurate. Implement annual reviews of all standing sustainability communications, with triggers for immediate review when circumstances change materially.





1. Integrate Credibility into Organisational Culture

Move beyond viewing sustainability communications as a compliance obligation and towards seeing transparency and accuracy as competitive advantages. Recognise that stakeholders increasingly value honest acknowledgment of challenges over polished narratives that promise perfection.

This cultural shift requires leadership commitment, performance incentives that reward accuracy over ambition, and organisational norms that celebrate learning from failures alongside successes.



2. Lead Industry Best Practice Development

Organisations achieving communication credibility should share their approaches. Contribute to industry guidance, participate in standard-setting initiatives, and mentor peers. Competitive advantage from sustainability leadership ultimately depends on market-wide credibility because if the sector loses trust, everyone suffers.

Develop Sector-Specific Claim Substantiation Guidance

Industry associations should create detailed guidance on sustainability communications tailored to built environment contexts. This should include worked examples of compliant and non-compliant claims for common scenarios: design competitions, development applications, project marketing, capability presentations, and ESG reporting.

Such guidance would reduce uncertainty about regulatory expectations and provide safe harbours for organisations following established protocols.

Establish Common Definitions and Terminology

The sector needs agreed definitions for frequently used sustainability terms. What constitutes “net zero”? What qualifies as the “circular economy”? What distinguishes “carbon neutral” from “carbon negative”? These definitions should align with regulatory guidance while addressing built environment specifics.

Common language enables meaningful comparisons and reduces opportunities for greenwashing through favourable interpretations.

Create Data Standards for Value Chain Transparency

Standardise the information requested from suppliers and shared between project partners. This might include: minimum EPD standards, embodied carbon calculation boundaries, material health documentation requirements, and end-of-life pathway verification.

Data standards reduce burden on individual organisations by creating consistent expectations across the supply chain.

Provide Worked Examples and Templates

Generic principles help less than specific examples. Industry resources should include annotated examples of sustainability communications showing what works, what doesn't, and why. Templates for common communication needs can embed best practices while allowing customisation.



Collaboration Mechanisms



Regular Peer Learning Forums

Create ongoing opportunities for practitioners to discuss challenges candidly. Quarterly roundtables, working groups focused on specific issues, and online communities can facilitate knowledge sharing that competitive dynamics typically prevent.

These forums work best under Chatham House rules or similar protocols that enable frank discussion without attributional risk.



Shared Case Study Library

Develop a repository of real examples, both successes and failures, from which the sector can learn. This requires organisations to be willing to share experiences, perhaps anonymised, for collective benefit.

Case studies should examine what was communicated, what went right or wrong, and what lessons apply broadly. Learning from others' mistakes prevents repeating them.



Industry-Wide Communication Protocols

Consider developing voluntary standards for sustainability communications that participating organisations commit to following. Such protocols might cover: minimum evidence requirements for different claim types, standard disclosure formats, independent verification expectations, and correction processes when errors occur.

Voluntary adherence demonstrates commitment to credibility while creating market differentiation for participants.



Collective Advocacy for Regulatory Clarity

to enforcement actions, advocate for clear safe harbours and worked examples that address built environment complexity.

As one roundtable participant noted from another sector's experience, industry can successfully push government towards higher standards when industry itself demonstrates leadership.



For Regulators and Government

Provide Clarity

✔ **Sector-Specific Guidance and Examples**

While the ACCC and ASIC provide general principles, built environment practitioners need applicable guidance addressing sector realities: collaborative delivery, performance uncertainties, technical complexity, and long project timelines.

Worked examples showing compliant and non-compliant communications for typical scenarios would dramatically reduce uncertainty.

✔ **Safe Harbour Provisions**

Consider creating regulatory safe harbours for organisations following documented best practices. If an organisation can demonstrate that it conducted reasonable due diligence, followed industry standards, and made good faith efforts to ensure accuracy, enforcement should focus on correction rather than punishment.

This encourages transparency and continuous improvement rather than defensive silence.

✔ **Regular Stakeholder Engagement**

Maintain ongoing dialogue with sector representatives about how guidance is being interpreted and where additional clarity is needed. Regulatory expectations should evolve in consultation with those implementing them, ensuring rules are both protective and workable.

Align Disclosure Requirements Across Agencies

Organisations face multiple regulators with varying expectations: ACCC for consumer claims, ASIC for investor disclosures, state planning authorities for development approvals, building regulators for compliance, and procurement frameworks for government projects.

Coordination across these requirements reduces compliance burden and inconsistency. Conflicting expectations create confusion that enables greenwashing.

Support Industry Transition

As new requirements emerge, provide implementation support. This might include: guidance on acceptable methodologies, transition periods with lighter enforcement during learning phases, technical resources for small organisations, and forums for clarifying questions.

Punitive enforcement during transition periods discourages adoption rather than improving practices.

Proportionate and Educational Enforcement

Not all greenwashing reflects wilful deception. Some results from misunderstanding, inadequate processes, or resource constraints. Enforcement should distinguish between bad actors deliberately misleading stakeholders and organisations making good faith errors.

For first-time, non-egregious violations, education and correction may be more effective than penalties at improving sector-wide behaviour.

Recognition of Complexity

The built environment involves long timelines, multiple parties, performance uncertainties, and technical complexity that distinguishes it from consumer product marketing. Regulatory expectations should acknowledge these realities.

This doesn't excuse greenwashing, but it suggests that enforcement should consider context and proportionality.

Focus on Systemic Improvement

The ultimate goal is not maximum penalties but credible sustainability communications that serve stakeholders. Enforcement strategies should prioritise raising overall sector standards rather than simply punishing individual violations.

This might include public reporting on enforcement actions that educates the sector, guidance documents responding to common violations, and recognition programs celebrating exemplary transparency.

The Charter's role in the Australian built environment sector includes:

Ongoing Convening and Collaboration.

We will continue facilitating forums where practitioners can candidly discuss challenges and share approaches. These conversations build collective knowledge and reduce isolation that individual organisations experience.

Resources and Tools Development.

The Charter can create practical resources tailored to Australian built environment needs: templates, checklists, case studies, and guidance documents, made freely available to raise standards across the sector.

Connection to International Best Practice.

We can also apply global learnings to the Australian context as we monitor regulatory and practice developments internationally. This allows us to easily identify transferable insights and emerging trends that should inform Australian approaches.

Support for Organisational Implementation.

The Charter can provide direct support to organisations seeking to improve communication credibility. This might include: reviews of communications against Charter standards, workshops on evidence management, and advisory relationships with committed signatories.

Advocacy and Thought Leadership.

Finally, we can engage with regulators, policy makers, and media to advance understanding of built environment communication challenges. Our role can be one of advocating for proportionate, supportive approaches that raise standards without driving counterproductive silence.

The Charter's value lies not in having all answers but in facilitating the collective work of developing them. Credible sustainability communication in the Australian built environment will ultimately be achieved through practitioners supporting each other towards shared standards, not through external imposition of rules.



6. Conclusion: Building Trust Through Credibility

The Australian built environment sector stands at a crossroads. The regulatory environment has fundamentally shifted and stakeholder expectations have matured. The comfortable ambiguity that previously surrounded sustainability communications has evaporated. Organisations now face clear choices: evolve towards radical transparency and credible communication, or risk enforcement action, reputational damage, and loss of stakeholder trust. The middle ground, business as usual, is no longer a viable strategy.



The Opportunity in This Moment

Trust is the currency of sustainability communications. Stakeholders, whether clients, investors, regulators, or the public, increasingly discount generic sustainability claims as noise. Those who can demonstrate genuine performance through transparent, evidence-based communication will command attention and loyalty. Moving forward, organisations embracing credible communication now will establish competitive advantage as regulatory enforcement intensifies and market sophistication increases.

The cost of credibility is less than it appears. Many organisations already possess the information and capabilities needed. They simply need to organise, document, and communicate it effectively. The investments required in systems, processes, and training pay dividends in reduced risk, improved stakeholder relationships, and organisational learning.



From Compliance to Competitive Advantage

Organisations should view credible communication not as a compliance burden but as a strategic opportunity. Sustainability performance increasingly influences project selection, investment decisions, talent attraction, and regulatory approvals. The ability to communicate that performance credibly becomes a market differentiator

This requires shifting organisational mindsets from “what can we claim?” to “what can we demonstrate?” The question is not how to market sustainability credentials but how to achieve genuine performance and communicate it honestly.

Organisations pursuing this path often discover that transparency drives internal improvement. When you must publicly substantiate claims, you identify performance gaps. When you acknowledge limitations, you create impetus to address them. Credible external communication and genuine internal progress reinforce one another.



The Collective Responsibility

While individual organisations must act, sector-wide credibility requires collective effort. No single organisation can create the trusted certification schemes, common standards, and shared infrastructure that would ease communication burdens while raising overall quality. Industry associations, professional bodies, government agencies, and initiatives like the Anti-Greenwash Charter all have roles in building this ecosystem. Success requires collaboration that transcends competitive dynamics.

The alternative, leading to a continued erosion of trust, threatens everyone. If stakeholders conclude that built environment sustainability claims are generally unreliable, the sector loses its social license to self-regulate. More prescriptive, burdensome regulation becomes inevitable. Market differentiation based on genuine sustainability leadership thus becomes impossible.

A Vision for Australian Leadership

Australia has the unique opportunity to lead globally in built environment sustainability communication. The regulatory environment, while challenging, creates pressure for evolution. The market sophistication, with increasingly demanding institutional investors and government clients, rewards such credibility.

Australian organisations that embrace radical transparency and evidence-based communication can set standards that influence international practice. The combination of regulatory enforcement, market pressure, and collective industry action could establish Australia as an exemplar of how to communicate sustainability credibly in complex, collaborative sectors.

This vision requires:



It also requires a collective commitment towards raising standards rather than racing to the bottom. Our call is for every organisation in the Australian built environment sector to:



Audit your current sustainability communications.

Identify claims that cannot withstand regulatory scrutiny and update or remove them. Implement processes ensuring future communications are defensible as well.



Embrace transparency.

Consider what information you could share that competitors don't, acknowledge limitations alongside achievements, and treat honesty as a competitive advantage.



Contribute to collective solutions.

Share your experiences with peers, participate in standard-setting initiatives, and support industry resources that help everyone improve.



Advocate for supportive regulation.

Engage with regulators seeking guidance that acknowledges sector complexity while maintaining high standards. Push for enforcement that educates and corrects rather than simply punishes.



See credibility as an opportunity.

Engage with regulators seeking guidance that acknowledges sector complexity while maintaining high standards. Push for enforcement that educates and corrects rather than simply punishes.

The path forward requires courage: courage to acknowledge where current practices fall short; courage to invest in improvement; and courage to communicate honestly even when that honesty reveals imperfection. But the alternative, continued greenwashing punctuated by enforcement actions and reputational crises, is far more costly. The sector can choose its future. Will it be one built on trust and credibility, or one defined by scepticism and defensive silence?

The choice is clear. The time is now. The opportunity awaits those willing to lead.



Appendices

Appendix A Roundtable Participants

The December 2025 industry roundtable included senior representatives from:

- ✓ Architecture practices
- ✓ Government architect offices (state level)
- ✓ Sustainability consulting firms
- ✓ Product manufacturers and suppliers
- ✓ Industry associations and product stewardship schemes
- ✓ Strategic communications consultancies

Participants contributed expertise spanning design, policy development, procurement, supply chain management, and communications strategy. The diversity of perspectives enabled comprehensive exploration of challenges across the built environment value chain.

Appendix B

Quick Reference Resources



Regulatory Guidance

ACCC Environmental Claims Guidance:

<https://www.accc.gov.au/about-us/publications/a-guide-to-making-environmental-claims-for-business>

ASIC Greenwashing Resources:

<https://www.asic.gov.au/regulatory-resources/financial-services/how-to-avoid-greenwashing-when-offering-or-promoting-sustainability-related-products/>



Industry Resources

Green Building Council of Australia: <https://www.gbca.org.au>

Australian Sustainable Built Environment Council:

<https://www.asbec.asn.au>

Australian Institute of Architects: <https://www.architecture.com.au>



The Anti-Greenwash Charter

Website: <https://www.antigreenwashcharter.com>

For inquiries about becoming a signatory or accessing resources, please contact the Charter at info@antigreenwashcharter.com

Appendix C

Communication Checklist

Before making any sustainability claim, verify:

- Accuracy: Is this claim factually correct and supported by documentation?
- Evidence: Can we produce verification if challenged by regulators or stakeholders?
- Specificity: Have we avoided vague terms like “eco-friendly” or “sustainable” without qualification?
- Context: Are comparisons based on clear, fair baselines?
- Clarity: Will our intended audience understand exactly what we’re claiming?
- Currency: Does this claim reflect current circumstances, not outdated information?
- Completeness: Are we avoiding selective disclosure that could mislead?
- Authorisation: Has this been reviewed and approved by appropriate functions?
- Documentation: Have we recorded the evidence, assumptions, and approval trail?
- Defensibility: Are we comfortable explaining and defending this claim publicly?

Red Flags Requiring Additional Review

- ✔ Forward-looking statements without documented implementation pathways
- ✔ Comparative claims without clear baselines
- ✔ Technical metrics without accessible explanation
- ✔ Claims depending on third-party actions or data
- ✔ Language that could be interpreted multiple ways
- ✔ Achievements presented without appropriate qualifications



Appendix D

Glossary



Embodied Carbon

Greenhouse gas emissions associated with materials and construction processes throughout a building's lifecycle, typically measured in kgCO₂e per square meter.



Environmental Product Declaration (EPD)

Standardised documentation of environmental impacts of a product across its lifecycle, based on international standards.



Greenhushing

The practice of organisations reducing or eliminating communication about sustainability credentials due to fear of greenwashing accusations or regulatory action.



Greenwashing

Marketing or communications that make an organisation appear more environmentally responsible than it actually is, whether through selective disclosure, vague language, or unsubstantiated claims.



Lifecycle Assessment (LCA)

Comprehensive analysis of environmental impacts throughout a product or building's entire life, from raw material extraction through end-of-life disposal or recycling.



Net Zero

Achieving balance between greenhouse gas emissions produced and emissions removed from the atmosphere. Requires both dramatic emissions reductions and credible offsets or sequestration for remaining emissions.



Post-Occupancy Evaluation

Systematic assessment of building performance after completion and occupation, comparing actual outcomes to design predictions.



Radical Transparency

Communications approach emphasising complete honesty about both achievements and limitations, including discussion of challenges, failures, and uncertainties.



Scope 1, 2, 3 Emissions

Standard categories for greenhouse gas accounting. Scope 1: direct emissions from owned sources. Scope 2: indirect emissions from purchased energy. Scope 3: all other indirect emissions in the value chain.



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GOVERNMENT



Karndean
Designflooring



VICTORIA
State
Government



The Anti-Greenwash
Charter

This report was prepared by John Pabon, sustainability consultant, author, and an advisor to the Anti-Greenwash Charter in Australia." It is based on insights from an industry roundtable held in December 2025 with Tzannes Associates, Karndean Designflooring ANZ, Sefiani, Architectus, Resilooop, The Victorian Government Architect, and The Government Architect NSW, as well as supplementary research on regulatory requirements and sector practices.

For questions, feedback, or information about contributing to future editions, please contact the Anti-Greenwash Charter.

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