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Australia's property industry

Creating for Generations

22 May 2020

The Hon Matt Kean MP
Minister for Energy and Environment,
GPO Box 5341
SYDNEY NSW 2001

Dear Minister,

[CLEANING UP OUR ACT - NSW GOVERNMENT 20 YEAR WASTE STRATEGY: MARCH 2020 ISSUES PAPER](#)

The Property Council welcomes the opportunity to provide comments on the NSW Government's draft 20 Year Waste Strategy (the Strategy) - ***'Cleaning Up Our Act: The Future for Waste and Resource Recovery in NSW.'*** We acknowledge the Government's strong environmental leadership and the collaborative way you have engaged industry on the Circular Economy.

Reducing landfill and changing behaviour is a problem bigger than our State alone. As such, we welcome and recognise the initiative of the Council of Australian Governments (COAG) to progressively ban the export of plastic, paper, tyres and glass waste from July 2020 and represents a historic change for recycling industry which will benefit the environment. For every 10,000 tonnes of waste sent to landfill there are approximately 2.8 direct jobs created. If we recycle the same waste, 9.2 direct jobs are created. It is clear that we can turn today's challenge into tomorrow's opportunity.

In order to realise these opportunities, it is important that Industry is provided certainty and we believe the Strategy goes a long way towards creating that.

This certainty will lead to a new confidence in the sustainability space, but also across the board when it comes to investment and talent attraction, and retention. It is critical to remember at all times that capital is global, fluid and as a jurisdiction we must be nationally and internationally competitive.

We support the approach taken within the issues paper which looks to practical measures which can often be low cost yet lead to the adoption of 'clean and green' as good business and as such can be high impact. In our engagement with members during the consultation period it was reported that there is a strong desire to see robust data which correlates with meaningful reporting of progress. It was also noted that greater support for smaller operators and innovators in waste and resource recovery. Our members embrace the ambitious targets and are implementing innovative practices but believe a competitive and diverse industry standard will lead to broad scale adoption of the principles and practices.

We note the goal of generating less waste by avoiding and ‘designing out’ waste, and by keeping materials circulating in the economy. These are really two concepts rather than one. Avoiding waste generation and keeping materials circulating – should be considered as two separate, but complementary approaches, with appropriate effort allocated to each.

Consistent messaging is a critical factor when attempting to reduce and ‘design’ out waste, with members citing the success of a simple ‘reduce, reuse, recycle’ campaign. Education is a low-cost high impact investment. Any behaviour change campaigns stemming from this Strategy should be targeted to the business and commercial sectors as well as household consumers.

The Property Council also sees a role for Government in identifying available land for place-based development processing. Place-based infrastructure needs to support decentralised waste management such as small scale, localised food waste management with a focus on small to medium sized plant and equipment at a suburb level.

As such, the Property Council makes the following recommendations:

1. Establish a more substantial link to the Circular Economy:

- It is essential the Strategy aligns to the Circular Economy principles, and resource and planning policy.
- Take a cross-jurisdictional approach on national waste monitoring standards and frameworks.
- Prioritise the creation of used materials markets within Australia with regard to international trends.
- Set substantial resource recovery goals that correspond with investment in processing infrastructure.

2. Develop a framework across the economy to promote longevity in material and product use.

- Drive demand for recovered materials using a range of interventions at all levels of government.
- Support the implementation of commercial building waste assessment to provide uniform data to advise targets and strategy, through use of the NABERS Waste rating tool in order to provide uniform, reliable data collection as the first step toward redefining waste as resources.
- Restrict the use of problem waste.
- Identify and target materials and products that restrict a transition to a Circular Economy.
- Work with industry and all levels of government to develop action plans to address these materials.

3. Invest in educational initiatives

- Investing early in behaviour change is cheaper and more sustainable than expensive later stage intervention
- This includes a focus on designing out waste
- Behaviour change campaigns stemming from this Strategy should be targeted to the business and commercial sectors as well as household consumers.
- View waste as a resource

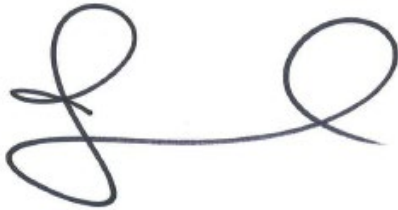
4. Put in place the waste treatment infrastructure of the 21st Century

- Place-based infrastructure needs to support decentralised waste management such as small scale, localised food waste management with a focus on small to medium sized plant and equipment at a suburb level.
- Invest and support the development of reliable waste and sustainability data

Please find attached to this letter a submission addressing the questions posed by the issues paper.

Should you have any questions in respect to this matter, please contact Sean Conway Senior Policy Adviser on 02 9033 1909 or sconway@propertycouncil.com.au

Yours sincerely

A handwritten signature in dark ink, appearing to be 'Jane Fitzgerald', written in a cursive style.

Jane Fitzgerald
NSW Executive Director
Property Council of Australia

Detailed response to the Issues Paper

Action on waste in Australia's property industry

The Australian property industry is a leader in the war on waste.

Through initiatives such as the Better Building Partnership (BBP) the industry is tackling the waste it creates. We are committed to a Circular Economy.

Action in the sector has arisen through the collection of reliable construction, demolition, and operational waste data which in turn has informed the creation of voluntary ratings-tools such as Green Star and NABERS. Tools such as these set leadership standards and benchmarking throughout the sector and translate into successful change in waste performance for those companies that engage with these methods.

While take-up of voluntary rating tools is high amongst industry leaders with strong sustainability mandates, there is **little awareness or incentive** to adopt these tools in the industry more broadly. The key issues the property industry faces in its bid to increase the rates of recycling and diversion from landfill are:

- Lack of infrastructure required to cope with recyclable material waste streams
- Lack of demand for recycled content in materials

Both issues require considered Government intervention and leadership.

The Better Buildings Partnership

The Better Buildings Partnership (BBP) comprises all major REITs in the City of Sydney, working together to address systemic sustainability issues faced by all property companies, including waste and materials recovery.

The partnership is committed to continuous improvement in the management of waste generated through the operation of commercial buildings. The Guidelines developed are a useful tool to assist building owners and property managers to work more effectively and consistently with their waste and cleaning contractors.

The partnership has undertaken collective work to develop practical guidelines to address waste arising from a change in tenancies (strip-out waste) and is currently focusing on identifying problem wastes in the sector.

NABERS Waste

NABERS is a national program to measure and benchmark sustainability performance in the built environment. They have a long history of working collaboratively with the property sector to underpin real change. In June 2018, NABERS launched a new method to rate the operational waste performance of office buildings, drawing on the work of the BBP and with strong consultation with the property sector and waste industry. The rating assesses the recycling performance of an office building by comparing its recycling rate to an industry benchmark, resulting in a NABERS rating out of 6 stars.

In September 2019, it added the Material Recovery Score to the rating. The Material Recovery Score is a measure of the quality of the end-of-life outcome of every waste stream leaving a commercial building. The score adjusts the rating to reflect the recovery outcomes of materials, driving effective waste to resource transition as well as influencing upstream material choices. At the time of writing the Property Council is confident this is the most reliable feature of its type on the Australian market and recognises its ability to promote the Circular Economy.

Green Star

Green Star is a voluntary sustainability rating system for buildings in Australia. It was launched in 2003 by the Green Building Council of Australia (GBCA) and has had success in aligning building development with a range of broader sustainability criteria. The GBCA is currently re-aligning its system in response to global megatrends such as climate change and resource inefficiency, through its Future Focus project.

The rating system has mirrored the global transition to Circular Economy principles. Credits are now available for responsible construction and operational waste, which encompasses responsible procurement. The direct credits that it attributes to the use of recovered materials and the proportion of responsible waste disposal, sets out the trajectory of performance and the capacity of current industry leaders.

Promote a resource rather than waste focus

The issues paper is framed as a waste strategy, which may hamper its ability to deliver the required resource productivity gains required to deliver a Circular Economy and drive down carbon emissions. Having waste rather than resources as a focal point creates two issues, the first being the preconception of the word itself and the second being a narrow view that a product's end of life is the only opportunity for resource strategy.

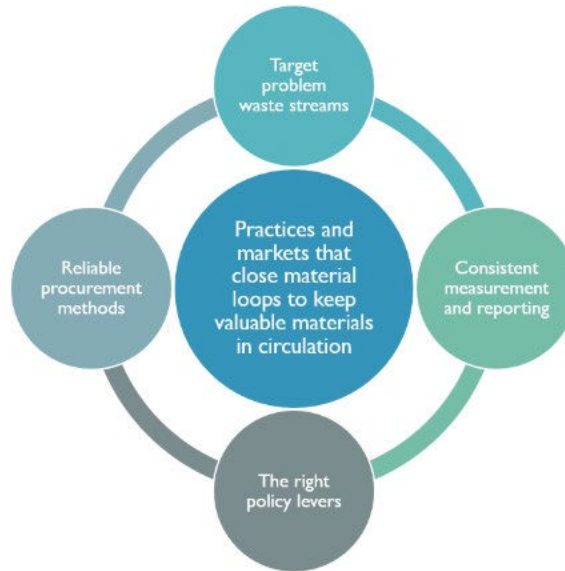
A traditional definition encourages traditional practices, defining a product as waste makes it difficult to transition perceptions away from the traditional practices of *bury, burn, or export*. By reimagining our labels, we re-evaluate the purpose and utility of resources. For instance, current demolition collection bins are waste until certain materials are proven to be recoverable, we propose the contrary in which every material collected is a resource until all reuse possibilities have been exhausted.

Another benefit of a resource focused strategy occurs by looking further upstream in a product or materials life. By incorporating resource management allows opportunities for resource-sensitive design, reuse, and repair strategies to effectively mitigate the need for waste management, rather than being focused on the management of a product at the end of its utility.

Educational and awareness programs are acknowledged as integral in this transition. Awareness of industry and the community of Circular Economy requirements such as repair and reuse options will further strengthen autonomy within the NSW recovery sector.

The Property Sector's Role in implementing a Circular Economy

The Property Council as a representative of the wider property sector promotes a cohesion between policy and industry leaders. This is well demonstrated here in *figure 1.1*.



(figure 1.1)

Property Council members can provide an invaluable insight toward best practice and make a valuable contribution to the forward-looking waste strategy. The Property Council extends the offer to collaboratively build effective policy in parallel to its members' outlined trajectory.

As such, please find our detailed responses to questions posed by in the Issues Paper.

Responses to Issues Paper Consultation Questions

Direction 1: Generate Less Waste

Question 1.1

What targets and metrics would be most effective in driving waste avoidance, reuse, and the Circular Economy?

The Property Council supports a move away from the simplistic metric of "diversion from landfill" as the sole measure of success in this policy space. We support the suggested targets "that aim to reduce high-volume waste materials (such as food waste), or high-risk to the environment (such as unnecessary plastics and litter). It could also include targets to drive recovery of waste materials, such as the use of recycled content in areas like construction and packaging".

In addition to these targets, the Government should investigate options to measure the circularity of the NSW economy to ensure that activities are aligned to the entire system and not just end of pipeline solutions. Such measures could include resource productivity, and measurement of the circularity gap¹.

How can these be implemented so they are most effective?

The right targets set a strong direction and guide activity; however they are only effective with appropriate strategies, action plans, resourcing, and strong data to ensure confidence in their achievement.

Question 1.3

What are new and innovative ways to engage consumers to reduce waste generation and increase recycling?

Experience from Property Council members suggests that waste reduction and improved recycling within commercial spaces can be affected by combinations of the following elements:

1. Reliable data on waste generation and recycling performance (including contamination rates), which can be used to communicate with building occupants, cleaning contractors, and building managers.
2. Plans for change, including signage and staff communication, preferably based on data results.
3. Interested, engaged and passionate staff within an organisation who have the tools and mandate to act; and
4. Creating an element of competition and 'norm'ing across similar entities – such as floors within an office building, or buildings within a portfolio. This relies on investment in reliable reporting, sometimes ensuring that individual bins can be allocated to specific tenancies in a building.

How can these be implemented so they are most effective?

Reliable Reporting Method

The barrier to most of the above action is strong, reliable data on the waste and recycling performance of a building. Expansion of a reliable data and reporting method across commercial and industrial businesses would underpin a more rapid change in waste reduction and recycling performance.

Training and Resources

Even with a data and reporting format, skills and information barriers will hamper improvement. Leading property companies have put the following elements in place to underpin their waste improvement plans. However, there are limited resources to roll this out across the sector. Provision of accessible training and resources for commercial and industrial companies could help drive more rapid change and the following is a suggested approach:

¹ <https://www.circularity-gap.world/>

- Advice on good practice signage, behaviour change campaigns for building occupants and staff, and support to adjust this over time.
- Sharing of good practice case studies and experiences. This can be a formal publication, but the sharing of experiences in forums such as the Better Building Partnership is also as effective.
- Training for cleaners in correct measurement of materials leaving a site, including use of scales where feasible, installation of equipment such as waste scales to ensure accurate data. It has been shown that weight-based data is more accurate than volume-based data and improves outcomes from waste reduction strategies; and
- Develop model contracts for waste collection companies that include required data and reporting standards.

Question 1.4

Would mandating waste reduction targets and data reporting requirements be effective?

Members who lead the way on meeting reductions, collect data on their waste and recycling performance and report this in their Annual Reports, and via GRESB² and other investment indicators. This practice underpins efforts to improve performance and ensures accountability to shareholders and building owners.

Following this experience, we believe that there is benefit to the Government in mandating waste targets and data reporting for NSW Government entities, which is then published publicly creating accountability.

What issues or limitations should be considered?

The property sector's capability to collect reliable data and perform credible reporting was developed over time through collective action via the BBP. Good quality data and reporting takes time and resources to develop and implement, so the rollout of a targets and reporting strategy should be staged to support good practice from government agencies so that reports are reliable and subsequent action is effective. However, we believe that the practices and guidance developed by the BBP (and codified in the NABERS Waste rules) are good practice that can be adopted by Government for their reporting entities.

Direction 2: Improve Collection and Sorting

Question 2.1

What are the key opportunities and challenges associated with mandating food and garden organics source separation? What other options could be considered for recovery of food and garden waste? What are the key opportunities and challenges with reducing emissions from food and garden waste to achieve net zero emissions from organics by 2030?

As more than seventy Australian Councils now provide Food Organics and Garden Organics (FOGO) services, and one of the first actions of the Strategy should be to remove any barriers to rolling out FOGO collections across NSW.

² <https://gresb.com/>

With regard to the commercial office sector, most of the contents of the general waste stream is food organics and targeting this stream would improve NSW's net zero target. There is strong willingness within the sector to implement best practice waste collection and source separation, especially where this aligns to ambitious net zero targets, but some barriers remain that could be addressed in the strategy. Specifically:

- Assistance to retrofit collection stations and basement infrastructure. Expansion of the BinTrim³ program to accommodate this but tying demonstration of results to the industry supported NABERS Waste rating rather than requiring a different assessment method, could be a simple method to deliver this outcome.
- Development of case studies demonstrating the business case to implement an organics collection system; and
- Guidance on which types of equipment are suitable for collection and processing, at large, medium, and small (building) scale. Commercial building owners are frequently approached by equipment companies promoting their technology as the best option. The absence of independent advice on the benefits and disadvantages of various technologies means that this decision is often deferred.

Question 2.4

How can National Australian Built Environment Rating System (NABERS) Waste ratings be used as an effective tool to drive better waste management practices in the commercial sector?

Property Council members have the most extensive experience in Australia with NABERS ratings. The commercial office sector has been using NABERS energy ratings for over 20 years to meaningfully compare real performance across portfolios and target practical change.

These actions have reduced energy consumption, on average, by 38% for office buildings that have had 13 NABERS ratings, and 24% for Shopping Centres that have had 8 ratings.

The Property Council strongly supports the collaborative, transparent and rigorous approach that NABERS takes to benchmarking the sustainability performance of the built environment.

The standards for data that it develops are fair and meet the needs of building owners and managers, which is why the standard is accepted by international reporting schemes such as GRESB. It is a least cost method of improving the performance of commercial buildings and reducing environmental impact.

The NABERS Waste Rating for Offices was developed in consultation with members of the Property Council, and it meets the operational needs of commercial office buildings in assessing waste and recycling performance. The introduction of the NABERS waste rating tool to 23 buildings in its first year and the commitment from industry leaders such as Dexus, Frasers and GPT to achieve waste ratings, demonstrates the confidence across the industry in the tool's potential.

The method addresses a core barrier to improved waste management in commercial properties: accurate waste management data.

³ <https://www.epa.nsw.gov.au/your-environment/recycling-and-reuse/business-government-recycling/bin-trim>

Accurate data is difficult for building operators to obtain due to a lack of agreed standards for measurement. Different waste management companies provide performance reports using their own methodology and so comparison of building performance requires strong administrative overhead before improvements can be costed and implemented.

A consistent data method for commercial waste generation to enable meaningful monitoring of waste practices is vital to identifying opportunities to alter operations. Anecdotal evidence from members suggests that reliable data is a catalyst to reduce waste to landfill by 15%.

It also provides incentive to improve supply chain practices and closed loop procurement decisions through the Material Recovery Score, which assesses the extent to which materials leaving the building were recovered for beneficial re-use and reduced potential pollution.

The Property Council supports minimum NABERS Waste requirements for buildings owned and rented by the Government. This Strategy aligns with existing requirements for minimum standards for energy and water ratings for buildings owned and leased by the Government. The commercial property sector is accustomed to delivering NABERS ratings, and this process has been highly successful in driving energy and water efficiency improvements.

What opportunities and challenges do you anticipate if the NSW Government were to introduce minimum NABERS Waste requirements for the buildings it leases and owns?

Most waste ratings certified in the first 21 months since the launch of the rating, have come from Property Council members, demonstrating best practice.

The commercial property sector can scale up to deliver Waste Ratings if appropriate policy signals and lead-in time is provided by the NSW Government. Leading property companies have piloted Waste Ratings within their portfolio, and three of our members are committed to rating their entire portfolio from next financial year. There has been a 50% increase in ratings in the first 3 quarters of Financial Year (FY) 20, compared to FY19. This trajectory demonstrates the potential for uptake of this rating. If the Government added a commitment to waste ratings in its procurement policies, the opportunity to mirror energy successes over a 5-10-year timeframe is achievable.

However, as ratings have only been possible for 21 months the entire sector is not yet ready for a minimum star-rating performance target.

The NSW Government should consider a roll-out strategy as follows:

- A requirement that all office buildings leased or owned by the NSW Government have a valid NABERS Waste rating, with 12 months notification of this requirement.
- Set a reasonable minimum star rating standard once the sector is accustomed to the process of achieving and maintaining waste ratings; and
- Increase this minimum requirement following appropriate review throughout the life of the 20-year waste strategy.

Potential challenges include:

- Rating affordability. This was addressed in the rating method design. Building owners can choose how much they wish to spend on data verification process and whether they conduct on-site audits. The method reduces the rating result for those buildings that do not comply with best quality data practices, which was deemed to be the best trade off to reduce a potentially high cost barrier for a robust result; and
- Availability of accredited assessors. The market for accredited NABERS Waste assessors is currently small, but able to meet current demand. However, the skills exist in NSW as there is complementarity between the BinTrim method and NABERS Waste. A clear signal to the waste assessor market that the NSW Government intends to mandate waste ratings in their owned and leased properties would increase the available assessors and improve market competition, driving down rating costs.

Both challenges have been addressed for the minimum NABERS Energy and Water ratings required by the NSW GREP, so should not be a significant barrier to uptake of the NABERS Waste rating.

Are there opportunities to roll out similar requirements to other sectors?

Whilst implementation of NABERS Waste for commercial offices buildings can drive accurate, uniform data for the property sector, if adopted as a standard for other commercial entities across NSW then it will allow the Government to track performance year on year from different sectors and can provide strong resource flow information, which could assist with trajectory modelling and the setting of informed targets.

NABERS recently released the Waste Data and Measurement Standard⁴ so that any business could adopt the same level of rigour in their waste performance reporting, and the rules for the Waste Rating for Offices are publicly available. Other than the process to develop a benchmark for specific industries there is no barrier to the NSW Government in applying this method to other sectors.

The Property Council believes that NABERS waste ratings would provide the market with a reliable tool to assess change in performance. NABERS has been operating for over 20 years and has demonstrated that “what gets measured gets managed”.

Question 2.7

What are your views on the opportunities and challenges of combining commercial and industrial waste streams? What are your views on the potential solutions of creating commercial waste zones, or combining municipal solid waste and commercial and industrial waste collections?

Overall the Property Council supports this concept, but we would want to see that any outcome in this space considers the following risks and opportunities.

The major risk in combining services is increasing contamination. The contamination profiles of industrial streams are different to those of residential, which are subtly different from commercial streams.

⁴ <http://nabers.gov.au/waste>

The consolidation of commercial and industrial services either within a dedicated region, or with residential contracts has the potential to reduce truck movements with the social benefits of improved safety, reduced traffic, and the environmental benefits of reduced particulate air pollution and reduced carbon emissions. Any proposal should demonstrate this benefit to the community in order to offset a risk of further consolidating waste collection services and reducing barriers to new entrants.

Like most markets, competition improves the quality of service and lowers the cost. New entrants should be encouraged.

Conversely this direction could make the collection and reprocessing of specialty streams more economically viable. Property Council members have identified a variety of waste streams that could be collected, but the economics of collection are problematic on a building by building basis. Paper towel and coffee cups are two examples, where these streams could be source separated within a commercial office building. The collection of specialty streams can also support social enterprises, for instance Mirvac uses *Mates on the Move* to collect some specialty streams from their buildings in the CBD. This operation employs former prisoners and provides them with a secure income to reduce their chances of going back into prison.

The consolidation of commercial streams may lead to opportunities for residential stream development. The commercial sector is very proficient at separating cardboard, commercial buildings are often located close to apartment complexes, which are increasingly generating cardboard due to the delivery of products from online businesses. There are potential efficiencies in rolling out a cardboard service to apartment buildings where contamination issues can be managed.

Direction 3: Plan for Future Infrastructure

Our overarching comment on Direction 3 is that this is a very important and core deliverable for the Strategy. The current state of infrastructure for resource recovery and systems to support a Circular Economy are lacking. This was demonstrated in the scramble to process resources following the China's shift in waste import policy, where some of our members were locked out of reprocessing options when capacity was constrained.

The property sector welcomes a place-based planning strategy based on reliable data. We shape Australia's built environment, and our members have experience in developing reliable waste generation data for the commercial businesses, as explained earlier in this response. As this element of the strategy progresses, we would welcome the chance to share our knowledge and expertise to ensure the best outcome for NSW.

Leading property companies have strong targets for NetZero buildings, and are starting to consider their Scope 3 emissions.⁵

⁵ https://ghgprotocol.org/sites/default/files/standards_supporting/FAQ.pdf

Direction 4: Create End Markets

Question 4.1

What are the main challenges and opportunities for using recycled content in state and local infrastructure projects and major development areas? Should procurement targets be established and what is the best way to develop and implement them?

We support initiatives to incentivise increased recovered and recycled content in infrastructure and major developments.

The main challenges centre around:

1. Security of supply of materials in the quantity and quality needed at time of build.
2. Information barriers regarding reliability and quality of materials; and
3. Inability to specify recycled content due to recipe-based specifications rather than performance-based specifications.

Where feasible, leading Property Council members have innovated to include recycled content, and recovered materials in developments, and would be happy to share their experiences and case studies to improve outcomes.

The establishment of procurement targets sends a strong signal to the market and encourages innovative thinking by designers and specifiers. However, targets should be set per material stream, not as a percent of the entire project. This will ensure real change, in it will incentivise difficult to recover materials as well as those where a high recycled content level is currently standard practice (e.g. concrete and steel).

Victoria's recent announcement of *Recycled First*⁶ as the basis for infrastructure design and procurement decisions sets out a practical approach to recycled content in infrastructure, and we encourage the Government to look to this example and harmonise requirements to reduce administrative burden on developers of infrastructure and major projects. This would be a strong step towards creating a market in Australia for recycled content building materials.

Question 4.2

What are the priority areas that standards and certifications should focus on? How critical do you think standards and certification are to developing markets for recycled content?

Property Council members can strongly influence Circular Economy outcomes in three areas, and standards and certifications within these areas would strengthen uptake of products and services. Specifically:

1. Building products
2. Furniture and fittings
3. Packaging

⁶ <https://roadprojects.vic.gov.au/about/recycle-first>

Building Products

Standards for the quality of recycled materials could underpin functionality and materials selection during the design phase of a building, but also assist with demolition/disassembly planning when a building reaches end of life. The Property Council acknowledges the work that the GBCA is undertaking as part of Future Focus to build partnerships for responsible materials in construction.

Buildings constructed today will be in use for over 50-60 years, the facade for over 20 years and plant and equipment for 15-20. The more rapidly we can deliver certainty to designers and specifiers of buildings, the greater the returns to the built environment that ultimately leads to better design and amenity of our built environment.

Furniture and fittings, and packaging

Building owners and managers have some influence over procurement decisions in this space but lack information to enable confident assessment in procurement and advice to tenants.

Information that specifies not just recyclability, but also recycled content, remanufactured or re-furnished status would enable building owners, managers, and tenants to make informed decisions and enact their corporate sustainability strategies and targets.

Good Environmental Choice Australia (GECA) has some strong certifications in this space, which are used by Property Council members. However, there is a gap in standards, labelling and transparent, reliable information which could be addressed through Government action.

Overall, standards and certifications should focus on driving the use of materials in line with the Circular Economy strategies to keep materials in use for longer at its highest function, avoiding downcycling or energy recovery until other options have been exhausted.

Question 4.3

How can industry and government best work together to foster partnerships and address information barriers to the uptake of recycled materials?

Information barriers that reduce the uptake of recycled, re-usable or remanufactured equipment and materials within the property sector are:

- trust in quality assurance for materials at time of design and specification
- easy identification of recycled material options compared to virgin material supply chain options; and
- facilitation of connections of materials from buildings with potential users.

A simple action that could reduce information barriers is a review of existing standards, labelling, and reporting, with recommendations on:

1. Which schemes are appropriate for what sorts of industries and decisions?
2. Identification of any gaps in standards and labelling; and
3. Specific actions to address significant gaps.

Findings should be made publicly available in an easy-to-reference format, which is regularly updated to maintain confidence in the information.