TRUE v2 Public Consultation Summary

Public Consultation Summary

Public Consultation was an integral part of the TRUE v2 rating system development. The TRUE v2 draft rating system was open for Public Consultation from February 25, 2026 through March 31, 2026. Market engagement during the Public Consultation period exceeded expectations with a total of 70 unique commenters and over 600 individual comments. Public Consultation provided diverse and valuable perspectives from the market, representing multiple regions worldwide across various sectors, including manufacturing, real estate, education, and government. Feedback from Public Consultation shaped revisions to the rating system draft aimed at improving overall clarity, adding specific guidance, and refining category names and credit flows.

Key Takeaways

Key highlights of the feedback include:

- Prerequisites: The shift from Minimum Program Requirements (MPRs) to prerequisites embedded in each category received positive feedback, with commenters appreciating that the prerequisites set a strong foundation for credit achievement.
- Category and Credit Streamlining: Commenters appreciated the reduction in the number of categories and the streamlined credits. Many commenters, however, provided feedback on the category names being unclear. The category names have been updated and can be found in the table below. The new category names have received positive feedback on their simplicity and clarity.
- Credit Weighting: Public Consultation provided positive reactions to the adjusted credit weighting by impact and effort. Individual credits have been adjusted to ensure that the weighting is right-sized and provides pathways to success for projects.
- Performance Metrics: The increase in quantitative performance impacts across waste, materials, cost, and emissions was well received by the market. Commenters requested additional guidance and clarity, which have been incorporated into the rating system and the Zero Waste Calculator.
- Clarity and Guidance: Public Consultation provided valuable feedback on unclear requirements and identified areas where increased guidance was needed. Credits have been updated to increase clarity and simplicity. Additionally, the final rating system is accompanied by credit-by-credit guidance and supplemental guidance to support projects.

Updated Credit Categories

Previous Category Name	New Category Name
Zero Waste Fundamentals	Fundamentals and Planning
Zero Waste Actions	Measurement and Analysis
Advancing the Circular Economy	Sourcing and Circularity
Implementing the Zero Waste Hierarchy	Reduction and Diversion
Fostering a Zero Waste Culture	Training and Engagement
Zero Waste Measurement and Performance	Performance and Impact
Project Priority	Project Priority

Credit-Level Feedback

In addition to the overall changes above, the table below provides additional details on specific credits adjustments made based on Public Consultation feedback. The table does not represent an exhaustive summary of feedback; rather it highlights the more substantial changes to the rating system based on Public Consultation or reasoning as to why the suggestions were not incorporated.

Credit	Feedback	Action Taken
Meet all Regulatory Requirements	• Comments indicated that the prerequisite may be a challenge to document for projects and reviewers.	• Removed as a prerequisite and added as confirmation in Required Project Information to reduce documentation for project teams and reviewers, while maintaining intent.

Credit	Feedback	Action Taken
Establish a Zero Waste Manager	• Commenters requested clarification on whether this is required to be a full-time role. • Comments suggested requiring that the job description is signed off by Human Resources.	• Adjusted guidance to confirm that this is not required to be a full-time role but should be proportionate to the size of the Zero Waste Program. • Included guidance to confirm that the role is not required to be named "Zero Waste Manager", as long as it covers established requirements. • No requirement was added for the job description to be signed by Human Resources, as this would add additional burden to teams without significant impact.
Conduct a Waste Audit	• Commenters suggested allowing the waste audit to be conducted prior to the reporting period so projects can make changes. • Comments requested clarification on scope of audit and sampling methodology. • Feedback indicated that a waste audit would be more impactful and successful with the inclusion of a TRUE Advisor.	• Changed requirements so that the waste audit can be conducted within 24 months prior to the end of the reporting period so that projects can use results to implement changes. • Updated requirements to confirm that all diverted and disposed waste streams must be included in the waste audit. Additional guidance was added regarding the sampling methodology. • The credit was not changed to require a TRUE Advisor as to not place additional burden on project teams, but a Project Priority credit was added that would provide an additional point for projects including a TRUE Advisor in the waste audit.
Conduct a Comprehensive Zero Waste Audit	• Commenters requested clarification of the requirements and expressed concerns over a three-day audit.	• Updated requirements for clarity and removed the three-day timeframe. • Restructured credit to be based on the Points of Generation, so project teams have a framework to evaluate materials before waste is generated.

Credit	Feedback	Action Taken
Analyze the Zero Waste Audit	• Comments questioned the feasibility of quantification and implementation of opportunities.	• Credit split into a "Plan and Implement" structure where projects can receive 1 point for quantifying five opportunities and 1 point for implementation of at least one strategy. • Adjusted requirements so that the opportunities can come from either the Waste Audit or Comprehensive Zero Waste Audit.
Develop a Purchasing Policy	• Commenters expressed concerns about the Purchasing Policy being a prerequisite and requiring a list of top materials. • Comments included concerns that the policy had to be project specific.	• This remains as a prerequisite, but requirements were adjusted to reduce level of effort for project teams. • Removed requirement to list top materials purchased and adjusted subsequent credits based on this requirement accordingly. • Modified requirements to allow for company-wide Purchasing Policies, as long as the project confirms that the policy applies to the project. • Added additional guidance to support project teams.
Prevent and Reduce within the Supply Chain	• Commenters provided feedback that the timeframe for changes to be implemented was unclear. • Feedback was provided on the 10% threshold being potentially unachievable.	• Removed 10% threshold requirement and added a requirement to supply narrative describing why the supplier was chosen for collaboration and what the impact to the project is. • Added language to the requirements that changes must have been implemented within 24 months prior to the end of the reporting period.

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Purchase Consumables for Zero Waste	• Commenters provided feedback that the recycled content requirement for both paper and an additional product type from the top 10 products may be unachievable in many scenarios. • Comments indicated that requiring third-party certification may be a challenge for some regions.	• Changed to Option 1: Post-Consumer Recycled Paper and Option 2: Recycled Content or Compostable/Biodegradable, providing more flexibility for projects. • Clarified that the paper under Option 1 includes office and janitorial paper products. • Removed requirement that product must be from top 10 purchased materials. Added a requirement to provide a narrative describing why the product was chosen and the impact on the project. • Removed requirement for third-party certification and moved to a best practice under Guidance.
Points of Generation	• Comments requested additional clarity around this credit, including the Points of Generation, the timeframe for implementation, and the quantification requirements.	• Adjusted credit from “Nine Points of Generation” to “Points of Generation” to not limit projects to a pre-determined list. • Expanded definition of Points of Generation in the rating system and provided additional guidance in Supplementary Guidance. • Removed the requirement for the comparative baseline to be in a specific timeframe.
Advance Local Circularity	• Commenters expressed the need for clarity especially as this is a new credit. Comments indicated that the credit was complicated and potentially too restrictive.	• Updated requirement language for clarity. • Removed requirement that the material must be from the top list of materials. The intent of the credit remains focused on local impact, so this provides flexibility for projects based on local infrastructure. Added a narrative to describe why the material was chosen and the impact on the project.

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Reduce Contamination	• Comments suggested that limiting the reduction to the top materials may be too restrictive. • Commenters requested clarity on timeframe for reduction. • Comments suggested a need for a threshold for contamination reduction in requirements.	• Removed requirement limiting the reduction to top materials and added a requirement to provide a narrative describing why the material was chosen and the impact on the project. • Added requirement that the reduction must be shown during the reporting period. • Did not add a threshold for contamination reduction, as contamination and impact can vary greatly.
Conduct a Zero Waste Orientation	• Commenters suggested changing the prerequisite from Conduct a Zero Waste Orientation to Communicate Zero Waste Initiatives.	• Kept Conduct a Zero Waste Orientation as the prerequisite so that all personnel are educated when joining the project for increased success.
Establish Local Partnerships	• Comments requested clarity and guidance. • Comments suggested alternative if the partnership was one-time versus ongoing.	• Updated requirements for clarity and increased guidance, including examples. • Adjusted narrative to either describe how the partnership will be ongoing or an explanation of why it was only a one-time occurrence.
Evaluate Greenhouse Gas Emissions	• Commenters questioned the feasibility of this credit.	• The updated rating system includes the release of the Zero Waste Calculator, which streamlines the emissions calculation. Added guidance to the rating system and calculator.
Evaluate Material Emissions	• Commenters questioned the feasibility of this credit based on data and knowledge of Scope 3 emissions.	• The updated rating system includes the release of the Zero Waste Calculator, which supports this credit. Added guidance to the rating system and calculator and expanded guidance in the Supplementary Guidance.

Credit	Feedback	Action Taken
Identify Zero Waste Community Impact	• Commenters provided feedback that quantification of community impacts may be unachievable at this time. • Commenters requested additional clarity of requirements.	• Changed credit from "Determine Zero Waste Community Impact" to "Identify Zero Waste Community Impact" to focus on identification versus quantification. • Added guidance and examples for increased clarity.
Minimize Waste Generation	• Comments suggested that establishing a baseline can be burdensome for projects. • Commenters requested clarity on waste intensity requirements. • Comments requested the baseline year to be based on estimates. • Commenters suggested moving to a prerequisite.	• Modified to a "Plan and Implement" structure where project teams can get 1 point for establishing the baseline and up to 4 additional points for showing a reduction in waste intensity compared to the baseline. • Added clarity and guidance on the waste intensity metric. • Did not change credit to allow baseline year to be estimates as this would not provide a meaningful comparison point for projects but added guidance to support projects. • Did not add as a prerequisite as increasing the amount of required waste data beyond the reporting year would prove to be burdensome for projects.