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FIRST EDITION
June 2025

Embedding Sustainability in Public Infrastructure Contracts:

Legal and Commercial Implications of the Draft Protection of the Environment Policy in NSW

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Preface

This paper is written for contract managers and industry professionals seeking to understand the likely practical and legal implications of the NSW Government's proposed *Draft Sustainable Construction Protection of the Environment Policy* (**Draft PEP**). It focuses on how the Draft PEP may affect the contracting chain, particularly contractors and subcontractors, by introducing new sustainability obligations and reporting requirements.

As someone who regularly advises public and private sector clients on infrastructure and renewable energy projects, I am particularly interested in the interface between policy aspiration and contract delivery. The Draft PEP sits at a complex intersection: it aims to shift environmental outcomes by embedding circular economy and carbon reduction principles into public infrastructure delivery, yet its effectiveness will depend heavily on how these objectives are implemented in real-world contracts.

This analysis is offered in the spirit of practical guidance and critical reflection. It aims to contribute to the conversation around sustainable procurement and to support those responsible for drafting, negotiating and delivering contracts that will meet the government's environmental goals while remaining commercially workable and cost-effective.

Introduction

The transition to sustainable construction practices is no longer aspirational, it is an imperative. Governments at all levels are deploying regulatory, fiscal and procurement levers to accelerate decarbonisation and the circular use of materials in the built environment. Within this evolving policy landscape, the NSW Government has released its Draft PEP,[1] the next proposed step in embedding environmental performance requirements into the delivery of public infrastructure.

This paper explores the likely legal, commercial and policy implications of the Draft PEP, with a focus on how its obligations will intersect with the *Sustainable Buildings SEPP*[2] (**Sustainable Buildings SEPP**), the *Decarbonising Infrastructure Delivery Policy*[3] (**DID Policy**) and broader trends in sustainable procurement. It draws particular attention to the elevation of recycled materials as a contractual consideration, the importance of upfront carbon disclosure and the shift toward performance-based frameworks in infrastructure delivery.

Framed through a legal lens, the analysis highlights the challenges and opportunities that arise when government policy is implemented through contract. It considers how lawyers can play a proactive role in operationalising sustainability mandates, managing associated risks and supporting the market transformation envisioned by the Draft PEP. While the document is currently in draft form, the policy trajectory suggests a new normal for government-led construction where environmental performance is monitored, reported and potentially enforced.

[1] Environment Protection Authority, *Sustainable Construction Protection of the Environment Policy* (Draft Report, December 2024).
[2] Department of Planning, *Sustainable Buildings SEPP: An overview of the new State Environmental Planning Policy for sustainable residential and non-residential development* (Revised Report, September 2023).
[3] NSW Government, *Decarbonising Infrastructure Delivery Policy: Reducing Upfront Carbon in Infrastructure* (April 2024).

Chapter 1: Overview of the Draft Protection of the Environment Policy

The Draft PEP represents a material development in the use of government procurement to drive environmental outcomes in public infrastructure. Released for public exhibition in December 2024, the policy seeks to embed low-carbon and circular economy principles directly into the planning, design and delivery of infrastructure projects.

At its core, the Draft PEP is underpinned by two key objectives: to minimise "upfront carbon" emissions and to promote the use of recycled materials in infrastructure construction. "Upfront carbon" refers to greenhouse gas emissions (**GHG**) associated with the production and transport of construction materials and the actual process of construction.[4] Unlike operational emissions, which are typically addressed through building efficiency standards, upfront carbon has historically escaped regulatory scrutiny.

The Draft PEP continues to fill this gap by requiring NSW Government agencies to consider and report the upfront carbon profile of major public infrastructure projects, defined as:

- building sector projects[5] over $50 million in estimated development cost (EDC)[6]; and
- all other infrastructure projects[7] over $100 million in EDC.

[4] This excludes GHG generated during the use and end-of-life phase of the asset: see PEP (n 1) 7.
[5] 'Building sector projects' is said to refer to projects such as schools, hospitals, prisons and other structures described in the *Environmental Planning and Assessment Act 1979* (NSW). However, this Act does not explicitly define 'building sector projects', with such a classification being determined at a policy level.
[6] EDC has the same meaning as set out in clause 6 of the *Environmental Planning and Assessment Regulation 2021* (NSW).
[7] 'Other infrastructure projects' is said to refer to projects such as roads, rail, bridges and dams. However, once more, there is no explicit definition in legislation.

These thresholds may be triggered by a single project or by a program[8] of related works. The policy operates across three lifecycle stages: (1) business case, (2) planning approval, design and procurement and (3) construction and practical completion.[9] At each stage, agencies must quantify relevant emissions, adopt reduction strategies and report on outcomes in accordance with evolving guidance issued by the EPA. At this stage, there are both mandatory and voluntary actions as set out in the DID Policy.

Complementing the upfront carbon reporting is a clear mandate to preference recycled materials on an "if not, why not" basis. This effectively reverses the traditional burden of justification: instead of asking whether recycled content is permissible, agencies will be required to explain why it is not used, absent valid cost, performance or environmental reasons.

In parallel, agencies will be required to collect data on the types, volumes and costs of recycled materials used, barriers encountered and materials reused on-site. The EPA will collate and publish this information to support ongoing policy refinement and market development.

Notably, the Draft PEP aligns with existing instruments such as the DID Policy, the *NSW Waste and Sustainable Materials Strategy 2041*[11] (**NSW Waste Strategy**) and the *Climate Change (Net Zero Future) Act 2023* (NSW) (**Net Zero Act**). It also anticipates interaction with the Sustainable Buildings SEPP, particularly in relation to embodied emissions disclosure. Where duplicative reporting would otherwise arise, the Draft PEP defers to Sustainable Buildings SEPP requirements.

By positioning environmental protection as a front-end consideration in infrastructure planning, the Draft PEP signals a policy shift from retrospective compliance to proactive, data-driven performance management. Its success, however, will depend heavily on the quality of guidance provided, the clarity of agency obligations and the legal and commercial mechanisms used to embed sustainability targets within procurement frameworks.

[8] 'Program', in short, refers to a group or projects. It would prevent, for example, a project being divided into smaller projects to avoid the PEP being applicable.
[9] PEP (n 1) 2.
[11] Department of Planning, Industry and Environment, *NSW Waste and Sustainable Materials Strategy 2041: Stage 1 2021-2027* (June 2021).

Chapter 2: Recycled Materials in Construction: Obligations and Innovation

The Draft PEP proposes to introduce a substantive cultural shift in the treatment of recycled materials in public construction. By adopting an "if not, why not" obligation, it elevates the use of recycled content from a discretionary option to a presumptive default subject only to justifiable exceptions.

This is significant in both legal and operational terms. It signals a transition from aspirational sustainability language to an outcomes-based expectation. Agencies and their contractors will be required not only to consider recycled alternatives, but to actively document the rationale for their inclusion or exclusion at multiple project stages.

Under the Draft PEP, these obligations will crystallise at three key stages:

1. **Business Case Stage:** Agencies must identify opportunities to minimise upfront carbon and incorporate circular economy principles early in the project scoping process. This includes evaluating whether new construction is required at all or whether an upgrade or repurpose of existing infrastructure is feasible. The business case must also document an upfront carbon assessment and outline any proposed recycled material objectives.
2. **Planning Approval, Design and Procurement Stage:** Agencies must formally document their strategy for using recycled materials in accordance with technical guidance. This includes early market engagement, assessment of recycled content availability and the inclusion of recycled materials performance criteria in tender documentation.
3. **Construction and Practical Completion Stage:** Agencies will be required to collect and report detailed data on the actual use of recycled materials during construction. This includes material type, quantity, cost, comparative data for non-recycled alternatives and qualitative insights into challenges or enablers encountered on site.

From a legal perspective, these reporting obligations introduce traceability and transparency, with the potential to become contractual benchmarks for performance. The reported data will be central to the EPA's monitoring function, which in turn will likely influence future regulatory settings, including minimum content requirements or financial incentives.

The Draft PEP's approach is also underpinned by a recognition of market maturity and innovation potential. The reporting framework seeks not only to monitor compliance, but to support market development through structured feedback. For example, barriers to uptake (such as inconsistent supply, performance variability or cost differentials) can be documented and analysed to inform investment in recycling technologies, specification standards and procurement training.

Importantly, the policy situates the recycled materials obligation within a broader framework of circular economy thinking. By capturing on-site reuse data and seeking lessons learned, it opens the door to more integrated lifecycle thinking about material flows and construction waste minimisation.

However, the effectiveness of the policy will hinge on how its "if not, why not" language is operationalised. Without clear thresholds or contractual consequences, there is a risk the obligation may be diluted in practice. For construction lawyers, the key challenge will be translating these policy aspirations into enforceable procurement and contract documentation that links performance obligations to tangible outcomes.

As such, the Draft PEP offers both an opportunity and a test for the legal sector: to craft frameworks that convert sustainability preferences into operational duties and to do so in a way that is both commercially realistic and legally sound.

Chapter 3: Interface with the Sustainable Buildings SEPP

The Draft PEP will not operate in isolation. It forms part of a broader legislative and policy framework aimed at embedding sustainability across the construction and infrastructure sectors in NSW. Of particular relevance is its interaction with the Sustainable Buildings SEPP.

The Sustainable Buildings SEPP applies primarily to residential and large-scale non-residential development.[12] It mandates the disclosure of embodied emissions and introduces new energy and water performance standards through instruments such as BASIX and NABERS. While the Sustainable Buildings SEPP and the Draft PEP apply to different project types and regulatory stages, they converge in their shared objective of reducing whole-of-life carbon impacts and encouraging sustainable material choices.

The key point of integration arises in relation to embodied emissions reporting. The Sustainable Buildings SEPP requires applicants to quantify emissions from construction materials at the development application or construction certificate stage. The Draft PEP recognises this overlap and intends to avoid duplicative reporting by exempting agencies from repeating the same disclosures under the Draft PEP if they have already satisfied the Sustainable Buildings SEPP obligations.

This acknowledgement of regulatory coherence is welcome. It reduces compliance burden and demonstrates a considered approach to policy layering. However, for legal practitioners advising government agencies or proponents of state-led projects, the distinction in policy scope and trigger thresholds must be carefully navigated. The Sustainable Buildings SEPP applies to developments above $5 million ($10 million for renovations) in EDC for non-residential projects,[13] while the Draft PEP thresholds are significantly higher and only apply to public infrastructure projects.

[12] Sustainable Buildings SEPP (n 2) 7.
[13] Ibid 8.

The Sustainable Buildings SEPP also introduces a "Net Zero Statement" obligation for large commercial and state significant developments, requiring applicants to demonstrate capacity to operate without fossil fuels by 2035. Although the Draft PEP does not explicitly replicate this requirement, its alignment with the Net Zero Act suggests that net zero readiness may become a future extension of Draft PEP reporting in infrastructure delivery.

Collectively, these instruments reflect a broader trend: planning policy is no longer confined to land use and built form but increasingly functions as a lever for climate and resource policy. The convergence of Sustainable Buildings SEPP and Draft PEP requirements underscores the importance of legal advisers adopting an integrated lens when reviewing project approvals, tender documentation and sustainability plans.

Chapter 4: Interface with the Decarbonising Infrastructure Delivery Policy

The Draft PEP and the DID Policy represent a coordinated and sustained approach by the NSW Government to drive down upfront carbon emissions and embed sustainability throughout infrastructure project lifecycles. While the DID Policy establishes the overarching carbon management framework, the Draft PEP appears to function as a downstream policy instrument that applies those principles more directly to procurement and project delivery.

The DID Policy (released in April 2024) provides a strategic framework for managing upfront carbon in public infrastructure projects. It sets out expectations for agencies to assess, reduce and report embodied emissions across project stages – from business case development through to construction completion. Its key features include:[14]

- applying a carbon reduction hierarchy;
- assessing the upfront carbon impact;
- engaging with the market; and
- developing a carbon management plan.

The Draft PEP (released later in December 2024) appears to take these principles and apply them more prescriptively. In particular, it will introduce a stronger enforcement mechanism by:

- requiring agencies to preference the use of recycled materials on an "if not, why not" basis, effectively reversing the traditional burden of justification;
- mandating project-stage reporting not only on carbon but also on types, quantities and costs of recycled materials used; and
- clarifying how obligations should be embedded in procurement and contract documentation.

[14] DID Policy (n 3) 21-41.

In this way, the Draft PEP can be viewed as the implementation arm of the broader DID Policy. It gives operational force to the DID Policy's aspirational carbon reduction framework, particularly in procurement.

The DID Policy introduces key obligations that the Draft PEP helps actualise in practice. For instance:

1. the DID Policy requires business cases to estimate upfront carbon emissions and encourages agencies to set carbon reduction targets. The Draft PEP will mandate that agencies document strategies for reducing emissions and consider recycled materials at each lifecycle stage;
2. the DID Policy calls for the development of carbon management plans. The Draft PEP anticipates these plans being a vehicle for recording recycled content use and decarbonisation actions in delivery contracts; and
3. the DID Policy introduces optional decarbonisation actions for "maturing" agencies. The Draft PEP appears to give these substance by treating some as de facto minimum expectations within contract frameworks.

The policies are mutually reinforcing and legal practitioners must ensure that compliance with one is not assumed to satisfy the other. While the DID Policy applies at a strategic planning level, the Draft PEP sharpens the focus on contractual performance, traceability and supply chain transparency.

From a contractual standpoint, the convergence of these policies will elevate the importance of clear, consistent and enforceable obligations across project documentation. Assuming the Draft PEP is adopted in its current form, practitioners advising government or tenderers must ensure:

- business case and tender requirements include baseline carbon estimates and reduction strategies as per DID Policy actions;
- recycled materials and low-carbon design alternatives are justified using the Draft PEP's "if not, why not" framing;
- carbon management plans are developed to a standard that satisfies both Draft PEP reporting and DID Policy compliance; and
- performance monitoring, risk allocation and incentives reflect the interconnected expectations of both policies.

Together, the Draft PEP and the DID Policy represent a shift from principles to practice – from high-level carbon management strategies to enforceable procurement expectations. Their combined effect is to embed environmental performance not only in project design, but in the legal and commercial architecture of infrastructure delivery itself.

Chapter 5: Performance-Based Procurement in Public Infrastructure

The Draft PEP's "if not, why not" mandate on recycled materials and its reporting obligations for upfront carbon, signal a pivot toward performance-based procurement in public infrastructure. This shift may have significant implications for how project delivery and construction contracts are structured, managed and enforced.

Performance-based procurement is predicated on the principle that government purchasers define desired environmental outcomes and require delivery partners to demonstrate achievement. In the case of the Draft PEP, these outcomes include reduced upfront carbon emissions and documented use of recycled materials. The policy leaves scope for innovation in how these outcomes are achieved but requires agencies to embed these performance metrics into procurement, design and delivery processes.

From a legal and commercial perspective, this shift challenges the traditional input-based approach where compliance is judged by adherence to specifications, rather than results. For construction lawyers, this demands new modes of thinking about risk allocation, contract administration and performance monitoring.

As outlined in Kreisson's eBook on risk allocation in renewable energy projects,[15] risk should not be indiscriminately pushed down the contracting chain.

[15] Tristan Cockman, *A Contractor' s Guide to Risk Allocation in Construction Contracts for Renewable Energy Projects* (Kreisson, March 2025).

Rather, it should be allocated to the party best placed to manage, mitigate and bear that risk in accordance with principles drawn from the Abrahamson Principles and Bunni Criteria.[16] The same logic applies to sustainability obligations.

For example, the risk of not meeting recycled content expectations may sit with the design team or lead contractor, depending on who controls specification and procurement. However, if market conditions (e.g. recycled material supply volatility) are outside their reasonable control, such risks must be recognised and mitigated through variation entitlements, supply chain clauses or shared incentive structures.

Similarly, carbon performance targets may depend on early-stage design decisions and supply chain maturity. Construction contracts must allow for early contractor involvement, iterative design collaboration and robust mechanisms for performance verification. Without these elements, agencies risk embedding sustainability obligations that are unachievable, leading to commercial disputes or delivery shortfalls.

In this context, the challenge is not merely one of legal drafting, but of aligning contract structure with policy ambition. Lawyers advising on public infrastructure procurement will need to ensure that sustainability KPIs are integrated into project governance, risk registers and payment milestones and are supported by clear reporting obligations and dispute resolution pathways.

Ultimately, the Draft PEP may push the infrastructure sector toward a more mature and holistic form of procurement, one in which environmental objectives are not aspirational slogans but enforceable project outcomes. The legal profession will play a central role in making this transition commercially viable and contractually robust.

[16] Ibid 8.

Chapter 6: The Rise of Circular Economy Principles

The Draft PEP is a product of broader shifts toward circular economy thinking within NSW and nationally. Circular economy policies seek to redesign production and consumption systems to retain the value of resources in the economy for as long as possible. In the construction sector, this manifests as increased focus on design for reuse, recovery of construction and demolition waste and the development of markets for recycled content.

The Draft PEP will reinforce this approach by mandating data collection on recycled material use and on-site reuse and by fostering innovation through reporting-driven market feedback. The EPA's ability to monitor and publish this data supports systemic learning across the infrastructure sector.

This is consistent with the NSW Waste Strategy,[17] which aims to transform waste into valuable inputs for manufacturing and construction. It also aligns with Infrastructure NSW's decarbonisation objectives and the National Construction Code's emerging emphasis on embodied carbon.

Internationally, this trend is echoed in instruments such as the EU Level(s) Framework[18] and the UK's PAS 2080 standard,[19] which create common metrics for carbon and material resource efficiency in buildings. In fact, the DID Policy specially seeks to adopt the PAS 2080 standard.[20] These frameworks highlight the growing expectation that asset owners and governments take full-lifecycle responsibility for the materials they procure and the emissions they cause.

[17] NSW Waste Strategy (n 10).
[18] European Commission, Level(s): *European framework for sustainable buildings* (Web Page) <https://green-forum.ec.europa.eu/levels_en>.
[19] British Standards Institute, *Carbon Management in Infrastructure and Built Environment – PAS 2080* (Web Page) <https://www.bsigroup.com/en-GB/insights-and-media/insights/brochures/pas-2080-carbon-management-in-infrastructure-and-built-environment/>.
[20] DID Policy (n 3) 16.

For legal practitioners, this shift has important implications for project structuring, particularly in how contracts address material provenance, performance warranties and end-of-life obligations. These elements may evolve into compliance items under future regulation. Understanding circular economy drivers will thus be crucial for advising on future-ready infrastructure contracts.

Chapter 7: Anticipated Contractor Challenges in Implementing the Draft Protection of the Environment Policy

While the Draft PEP is directed at NSW Government agencies, its implementation will likely have an impact on the construction sector, especially contractors and subcontractors delivering public infrastructure. This chapter explores the practical challenges contractors may face when agencies operationalise the policy.

1. **Implementation by Agencies and Contractual Effectiveness**

Agencies will likely incorporate the Draft PEP's recycled materials and carbon reporting requirements into project documentation and contractual deliverables. However, the method and rigour of implementation may vary. Some agencies may require detailed reporting in design documentation or construction phase deliverables, while others may incorporate vague or non-enforceable obligations. For contractors, this uncertainty poses a legal and commercial risk, particularly if reporting obligations are imposed without clear scopes, templates or accountability mechanisms.

2. **Consistency Across Agencies**

Given the policy's decentralised application through agency procurement, a possible concern is the potential inconsistency across projects. Different agencies may apply differing standards or expectations for recycled material use and upfront carbon disclosure. For contractors operating across multiple projects, this could lead to administrative duplication, inefficiency and increased risk of non-compliance.

3. **Scope and Burden of Reporting Obligations**

Contractors may be required to report not only on materials used, but on alternatives considered and rejected, raising questions about the breadth and proportionality of this obligation. Does the duty extend to every conceivable material input or only major materials? This ambiguity affects how contractors approach specification, procurement and subcontractor engagement. Moreover, it raises the question of whether reporting alone will truly shift behaviour or whether greater investment in supply chain development would achieve more effective outcomes.

4. **Resourcing and Cost Implications**

Meeting Draft PEP reporting expectations may require contractors to either upskill internal teams or engage external consultants to compile and validate data. This resourcing has real cost implications. Where tender pricing does not sufficiently account for these obligations or where scope is ambiguous, contractors may be exposed to increased costs.

5. **Impacts on Small and Medium Contractors**

The burden of compliance may disproportionately impact smaller contractors who lack the resources or administrative capacity to manage complex reporting. This poses a potential contradiction in government policy: while some initiatives are aiming to unbundle major projects to encourage SME participation, policies like the Draft PEP may inadvertently create barriers to entry unless adequately supported. Without scalable tools or guidance, smaller contractors may be discouraged from bidding, ultimately reducing competition and innovation.

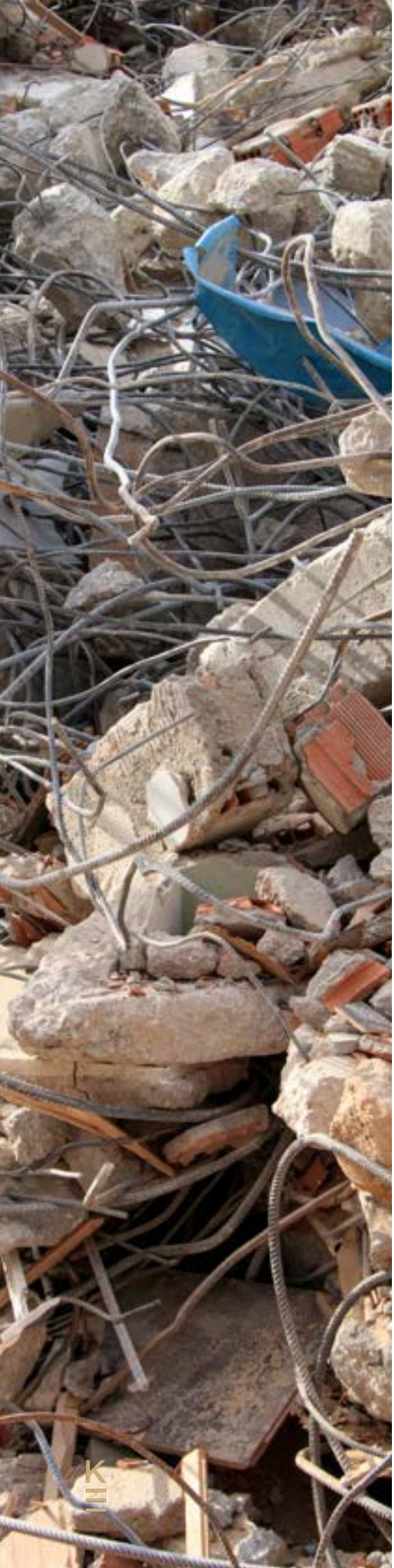
Even where larger contractors secure government infrastructure contracts, the practical impact of the Draft PEP may still fall heavily on smaller subcontractors. It is highly likely that larger contractors will seek to pass down reporting and sustainability obligations through the subcontract chain. This means SMEs may find themselves subject to the same documentation and compliance requirements, but without the administrative or financial capacity to meet them effectively. In such cases, subcontractors may be forced to absorb compliance burdens they did not anticipate or price for, adding risk, cost and commercial pressure to already competitive arrangements.

Chapter 8: Recommendations for Implementation

To mitigate the challenges identified in Chapter 7 and support more effective implementation of the Draft PEP across the contracting chain, several measures may need to be considered:

- **Develop standardised templates and clauses:** Uniform documentation across agencies will reduce transaction costs and uncertainty.
- **Ensure procurement guidance is centrally coordinated:** Agency-level variation should be minimised through a whole-of-government implementation strategy.
- **Limit the reporting burden to material inputs with significant environmental impact:** Establishing materiality thresholds would prevent unnecessary administration.
- **Scale obligations to contractor capacity:** Smaller contractors should not be subject to the same granular reporting obligations as large Tier 1 contractors without support.
- **Support workforce and systems development:** Agencies should consider funding or subsidising training, systems and advisory support, particularly for SMEs.
- **Invest in waste sorting and recycling infrastructure:** Improving material separation and collection at source will enhance recycled material quality and reduce costs, improving market competitiveness.

These steps are not exhaustive but highlight key leverage points. Policy ambition must be matched by implementation that is legally sound, commercially viable and sensitive to the operational realities of the construction industry.



Conclusion

The Draft PEP is a bold policy instrument that positions NSW as a leader in embedding environmental performance into public infrastructure delivery. Its focus on upfront carbon and recycled materials reflects a broader evolution in how governments perceive their role in shaping construction markets and climate outcomes.

Yet, for the Draft PEP to deliver on its promise, it must be more than a statement of intent. The obligations it imposes, particularly those relying on soft mechanisms like “if not, why not” justifications, must be backed by clear contractual integration, market guidance and institutional capability. Without this, the risk remains that the policy will generate compliance documentation without driving meaningful change.

Lawyers have a central role to play in ensuring this policy is translated into practice. From drafting clauses that properly allocate sustainability risks and responsibilities, to advising on how best to verify and enforce environmental performance, legal practitioners are key intermediaries in the delivery of sustainable infrastructure.

Ultimately, the Draft PEP, if adopted, will challenge all parties, government, industry and legal advisers, to recalibrate their thinking. Environmental outcomes will no longer sit at the margins of infrastructure delivery. They will need to be designed in, costed in and contracted in from the outset.

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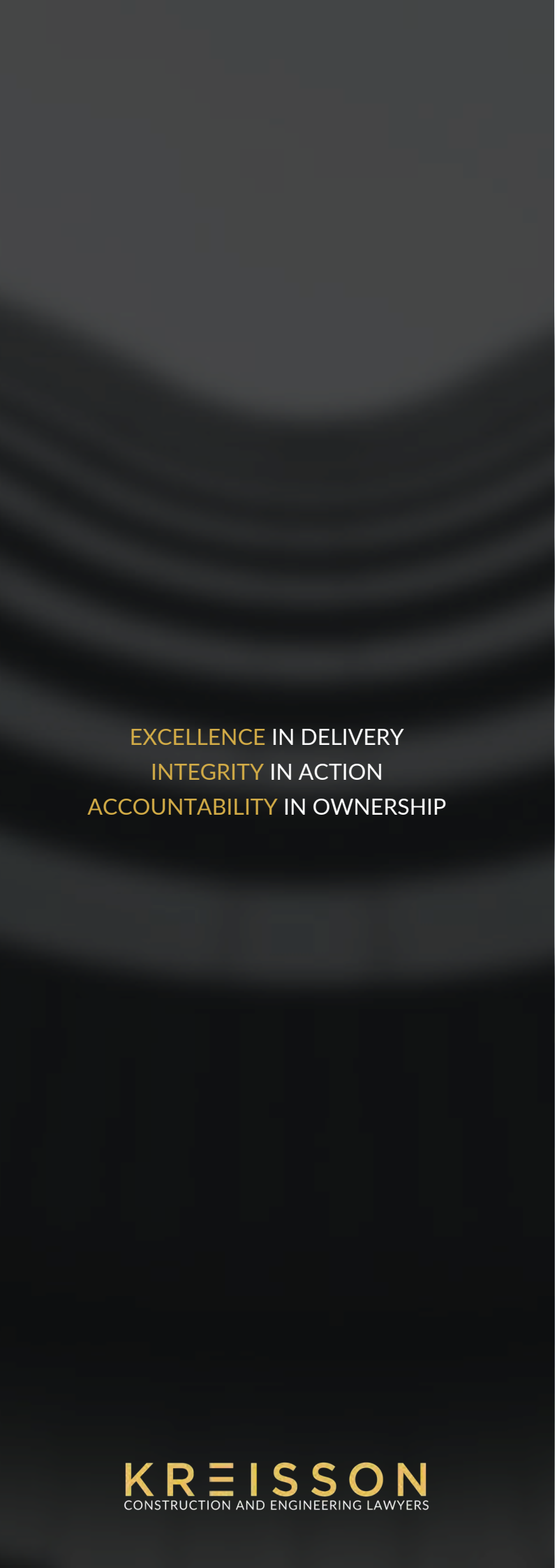
With over 16 years of experience, Tristan is a seasoned legal expert specialising in energy, construction, property and planning law. His career spans top-tier law firms as well as in-house roles within ASX-listed and internationally listed companies. Tristan has provided end-to-end legal advice to a diverse range of clients, including energy companies, developers, builders and contractors, showcasing his versatility and depth of knowledge across industries.

Tristan's expertise lies in preparing and negotiating contracts, conducting contract reviews and assisting with contract management. He has also advised on planning matters, including conducting planning appeals and defending planning prosecutions. His recent work included reviewing legal agreements as part of the due diligence process for a large-scale wind, solar and green hydrogen development exceeding 5GW.

As an articulate communicator and skilled public speaker, Tristan has a unique ability to distil intricate legal and commercial concepts into clear, engaging and actionable insights. He brings a balanced approach to his work, combining a commercial big-picture mindset with attention to detail. Committed to continuous learning, Tristan actively contributes to thought leadership and industry best practices, further solidifying his reputation as a trusted expert in property, construction and energy law.



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