

4 March 2019

Phil Manners
Director
The CIE
Level 7, 8 Spring Street
SYDNEY NSW 2000

pmanners@thecie.com.au

Dear Phil

REVIEW OF THE COMMERCIAL BUILDING DISCLOSURE PROGRAM – ISSUES PAPER

The Australian Sustainable Built Environment Council (ASBEC) is a strong supporter of the Commercial Building Disclosure (CBD) program.

ASBEC is a body of peak organisations committed to a sustainable built environment in Australia. ASBEC's membership consists of industry and professional associations, non-government organisations and government observers who are involved in the planning, design, delivery and operation of our built environment. ASBEC has twenty-seven industry members, including the Property Council of Australia, Green Building Council of Australia, Australian Institute of Refrigeration, Air Conditioning and Heating, Energy Efficiency Council and Facilities Management Association of Australia. Collectively, ASBEC's membership has direct reach to more than 300,000 professionals in the built environment and represents an industry worth more than \$700 billion in value.

ASBEC's [Low Carbon, High Performance](#) report outlines the great potential of Australia's built environment to reduce emissions and save energy, and highlights the importance of the CBD program in driving improvements in the large office sector. The findings of the ACIL Allen review in 2015 confirmed our position and we welcomed the extension of the scheme to offices above 1000m².

ASBEC also supports the expansion of disclosure policies to other building types, noting in particular the strong potential identified for mid-tier buildings (classed as non-A Grade or non-Premium Grade) and tenancies, as outlined in [Opportunity knocks: Accelerating energy efficiency for mid-tier buildings](#).

We support the actions in *Opportunity Knocks* as they relate to the CBD program:

- Investigate reducing the disclosure threshold for Commercial Building Disclosure below 1000m² to capture more mid-tier office buildings at the lowest cost-effective threshold for this sector.
- Expand Commercial Building Disclosure to new sectors including but not limited to mid-tier building stock, and with a priority focus on office tenants.

We note the [research findings](#) from Energy Action, showing that substantial energy and cost savings could be achieved through the expansion of mandatory disclosure to office tenancies. The 'Opportunity Coalition', consisting of key ASBEC members, is leading further work in this context and we encourage consideration of their pending recommendations.

Yours Sincerely



Suzanne Toumbourou
Executive Director

