# Commercial Building Disclosure (CBD) Expansion Consultation

## Take the survey

Climate

Response received at:

August 28, 2024 at 03:41 PM GMT+9:30

Response ID: sbm302db4f4e5d0514f6d1cf

- 1 Confirm that you have read and understand this privacy notice. Yes
- 2 Please indicate how and if you want your submission published.
  Public
- 3 Published name

Abhinav Tiwari

- 4 Confirm that you have read and understand this declaration. Yes
- 5 First name

Abhinav

6 Last name

Tiwari

7 Email

8 Phone

Not answered

- 9 Who are you answering on behalf of? Individual or individuals
- 10 Organisation name

Not answered

- 11 What best describes you or your organisation? Energy assessor
- 12 What state or territory do you live in?



13 Postcode



14 What area best describes where you live?



15 Would you like to:

Complete the survey with option to upload a submission

- 16 Have you removed any identifying information from your submission?

  Not answered
- 17 Upload a submission

Not answered

18 Upload a supporting document (optional)

### 19 Skip to end of survey

Not answered

- 20 Please rate your level of awareness and knowledge about the Commercial Building Disclosure (CBD) Program. high
- 21 Please rate your level of awareness and knowledge about the National Australian Built Environment Rating System (NABERS)

  high
- 22 What type of building/s are you responding about:

office building

hotel

office tenancy

shopping centre

data centre

warehouse

cold store

residential aged care

retirement living

23 If other, please specify

Not answered

24 If you are responding about a particular building, does that building currently have a National Australian Built Environment Rating System (NABERS) rating?

Yes

25 Who is most interested in your buildings' energy use?

building manager / facility manager

ownership [owner/board/shareholder/partners]

tenants

banks / funding / investors [green finance]

#### governments

### 26 If other, please specify

Not answered

27 Are there barriers to you getting and disclosing your building's energy rating?

Yes

28 What are the barriers?

The cost of getting a NABERS Assessment Understanding of the benefits of NABERS ratings by decision makers

Difficulty accessing metering

Hesitancy to get and disclosure rating due to a potential poor energy rating. Understanding of the benefits of NABERS ratings by decision makers

29 If other, please specify

Not answered

- 30 What might be needed to help you overcome those barriers?
  Early warning of policy changes impacting your business/building/investment
  Information about how to make changes to improve the energy efficiency
  Subsidised ratings for first time raters
- 31 If other, please specify

Not answered

32 Do you have any suggested improvements to the current program and how it operates?

Not answered

What benefits do you think there are in having a valid NABERS rating?

better able to know and control building energy use (cost savings)

able to know and reduce the buildings carbon emissions

making buildings more attractive to potential buyers/renters/investors/stakeholders/the

public

### 34 If other, please specify

Not answered

35 What are your views on expanding the CBD Program to different types of commercial buildings in line with the suggested road map (see discussion paper for a description of the road map)?

The success of CBD Program in the commercial office buildings sector is in itself a testament to the importance of building disclosures. As such, it makes perfect sense to expand the program to other buildings as without this the entire purpose of the program gets defeated. This is because it is not just the office buildings that consume energy and emit GHG gases - all buildings contribute to global emissions and affect climate change. There is no doubt that all building types should be included in the mandatory disclosure.

36 What do you see are the key opportunities and benefits to expanding the coverage of the CBD Program?

You cannot control what you do not measure. Expanding the coverage of CBD Program will help in measuring the consumption, intensity and emissions from different building types, which is required if we are to collectively tackle the climate change issues and global warming. This is required to be in line with federal government's net zero targets.

37 What are the perceived draw backs, key challenges, or areas of concern you have for the expansion of the CBD Program to your sector / building type?

Costs of increased regulation [Fees and charges]

Poor rating of building

Costs associated with upgrading building to improve star rating

Challenges to improve rating in a heritage building

Increased administrative burden

Having adequate time to prepare for changes

## 38 If other, please specify

Please outline any issues specific to a building type that would need to be considered if the program was expanded to that building?

Not answered

40 In addition to the NABERS Energy rating, select any other information that should be disclosed

Scope 1 emissions from on-site activities (for example gas use, diesel use and refrigerants) The NABERS Renewable Energy Indicator which displays the proportion of the building's energy that comes from on-site renewable energy generated and off-site renewable energy procured

41 If other, please specify

Not answered

42 Select which of the following ownership structures should be included in any expansion of the CBD Program:

All

43 Provide Reasons for all to be included

Not answered

44 Provide Reasons for any not to be included

Not answered

45 If office tenancies are included in the CBD Program should offices still be required to have a Tenancy Lighting Assessment (TLA) as part of the Building Energy Efficiency Certificate (BEEC)?

No

46 Please specify

Not answered

47 Provide reasons

What are your views on the use of minimum energy performance standards in the road map to set a minimum standard for buildings to reduce their operational emissions and improve their energy efficiency? I can see a need to set minimum energy performance standards to ensure that buildings that do not adequately respond through disclosure make improvements

### 49 Please specify

Not answered

#### **50** Further comments

Not answered

#### 51 Provide reasons

Not answered

#### **52** Provide reasons

Not answered

For the following two questions select the building types you wish to provide feedback on:

Office Buildings

Office Tenancies

Hotels

**Public Hospitals** 

**Data Centres** 

**Shopping Centres** 

Residential Aged Care

**Cold Stores** 

**Higher Education** 

**Medical Centres** 

Supermarkets

Schools

**Retirement Living** 

Warehouses

**Retail Stores** 

**Private Hospitals** 

## 54 Office Buildings

Sale or lease of building space of 500 m2 or more meters

## 55 Please specify

Not answered

## 56 Office Tenancies

Sale or lease of building space of 500 m2 or more meters

### 57 Please specify

Not answered

#### 58 Hotel

Every 12 months

## 59 Please specify

Not answered

## **60** Shopping Centres

Every 12 months

## 61 Please specify

Not answered

#### 62 Data Centres

Every 12 months

### 63 Please specify

Not answered

## 64 Public Hospitals

Every 24 months

## 65 Please specify

Not answered

## 66 Residential Aged Care Every 24 months

## 67 Please specify

Not answered

# 68 Retirement Living Every 24 months

## 69 Please specify

Not answered

## 70 Warehouses Every 24 months

## 71 Please specify

Not answered

# 72 Cold Stores Every 24 months

## 73 Please specify

Not answered

# **74** Schools

Every 24 months

## 75 Please specify

# 76 Retail Stores Sale or lease

## 77 Please specify

Not answered

# 78 Higher Education Every 24 months

### 79 Please specify

Not answered

# 80 Supermarkets Every 12 months

## 81 Please specify

Not answered

# 82 Private Hospitals Every 12 months

## 83 Please specify

Not answered

# 84 Medical Centres

Every 12 months

## 85 Please specify

Not answered

## 86 Other [e.g. Galleries/sport facilities]

### 87 Please specify

Not answered

## 88 Office Buildings

Disclosure on Government Register

Disclosure at premises

Disclosure on website

Disclosure on real estate advertisement

#### 89 Please specify

Not answered

#### 90 Office Tenancies

Disclosure on Government Register

Disclosure at premises

Disclosure on website

Disclosure on real estate advertisement

## 91 Please specify

Not answered

#### 92 Hotels

Disclosure on Government Register

Disclosure at premises

Disclosure on website

Disclosure on real estate advertisement

Disclosure on booking sites

Disclosure on room booking

## 93 Please specify

Not answered

## 94 Shopping Centres

Disclosure on Government Register

Disclosure at premises

Disclosure on website

Disclosure on real estate advertisement

## 95 Please specify

Not answered

#### 96 Data Centres

Disclosure on Government Register

Disclosure at premises

Disclosure on website

Disclosure on real estate advertisement

## 97 Please specify

Not answered

#### 98 Public Hospitals

Disclosure on Government Register

Disclosure at premises

Disclosure on website

## 99 Please specify

Not answered

## 100 Residential Aged Care

Disclosure on Government Register

Disclosure at premises

Disclosure on website

Disclosure on real estate advertisement

## 101 Please specify

Not answered

## 102 Retirement Living

Disclosure on Government Register

Disclosure at premises



#### Disclosure on website

### 103 Please specify

Not answered

#### 104 Warehouses

Disclosure on Government Register

Disclosure at premises

Disclosure on website

Disclosure on real estate advertisement

#### 105 Please specify

Not answered

#### 106 Cold Stores

Disclosure on Government Register

Disclosure at premises

Disclosure on website

Disclosure on real estate advertisement

## 107 Please specify

Not answered

### 108 Schools

Disclosure on Government Register

Disclosure at premises

Disclosure on website

# 109 Please specify

Not answered

#### **110** Retail Stores

Disclosure on Government Register

Disclosure at premises

Disclosure on website

#### Disclosure on real estate advertisement

## 111 Please specify

Not answered

## 112 Higher Education

Disclosure on Government Register

Disclosure at premises
Disclosure on website

## 113 Please specify

Not answered

#### 114 Supermarkets

Disclosure on Government Register

Disclosure at premises

Disclosure on website

Disclosure on real estate advertisement

# 115 Please specify

Not answered

## 116 Private Hospitals

Disclosure on Government Register

Disclosure at premises

Disclosure on website

# **117** Please specify

Not answered

#### **118** Medical Centres

Disclosure on Government Register

Disclosure at premises

Disclosure on website

### 119 Please specify

Not answered

## 120 Other [e.g. Galleries/sport facilities]

Not answered

## 121 Please specify

Not answered

122 Please provide any other comments you wish to make about the proposed CBD Expansion

Not answered

**123** Would you like to upload a document?

No

124 Have you removed any identifying information from your submission?

Not answered

125 Upload a submission

Not answered

126 Upload supporting file