

# Commercial Building Disclosure (CBD) Expansion Consultation

## Take the survey

Climate

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Response received at:

August 14, 2024 at 12:11 PM GMT+9:30

Response ID:

sbm2fe4dbcd183b92df4b301

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- 1 Confirm that you have read and understand this privacy notice.  
Yes
- 2 Please indicate how and if you want your submission published.  
Public and anonymous
- 3 Published name  
Not answered
- 4 Confirm that you have read and understand this declaration.  
Yes
- 5 First name  
[REDACTED]
- 6 Last name  
[REDACTED]
- 7 Email  
[REDACTED]

- 8 Phone  
[REDACTED]
- 9 Who are you answering on behalf of?  
Organisation
- 10 Organisation name  
[REDACTED]
- 11 What best describes you or your organisation?  
Building owner
- 12 What state or territory do you live in?  
[REDACTED]
- 13 Postcode  
[REDACTED]
- 14 What area best describes where you live?  
[REDACTED]
- 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)  
Not answered

- 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
- 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?  
No
- 25 Who is most interested in your buildings' energy use?  
ownership [owner/board/shareholder/partners]  
tenants
- 26 If other, please specify  
Not answered
- 27 Are there barriers to you getting and disclosing your building's energy rating?  
No

- 28 What are the barriers?  
Not answered
- 29 If other, please specify  
Not answered
- 30 What might be needed to help you overcome those barriers?  
Not answered
- 31 If other, please specify  
Not answered
- 32 Do you have any suggested improvements to the current program and how it operates?  
N/A
- 33 What benefits do you think there are in having a valid NABERS rating?  
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)?  
I think it is a good idea, especially when selling or buying new property.
- 36 What do you see are the key opportunities and benefits to expanding the coverage of the CBD Program?  
attractive for buyers. Opportunity to justify energy enhancement projects and forecast ROI

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

Increased administrative burden

38 If other, please specify

Not answered

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

Hotels are usually slow-moving gear due to market transformation and over supply which make it financially challenging to justify such approaches to investors and shareholders if no direct financial improvement.

Hotels are unable to increase the cost per room to support such initiatives and increase their environmental performance due to market oversupply and such initiatives are expensive which will lead to poor financial performance.

Hotels are dealing with variety of clients/visitors, globally & nationally, with different expectations, and hotel operators have no control over such behaviors and expectations, therefore the same principles applied for offices can't be used for hotels.

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

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:

Company  
Trusts

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

Lighting is a small component and the BEEC can be calculated from the energy invoices (w/m<sup>2</sup>)

48 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 the need for minimum energy performance standards but disagree with the implementation proposed in the roadmap

49 Please specify

Not answered

50 Further comments

Not answered

**51 Provide reasons**

Not answered

**52 Provide reasons**

The availability of technology to support such performance without jeopardizing the wellness of humans or tenants/guest requirement.

Cost of technology is very high, making it challenging to implement or justified. i.e electrifying existing buildings require upgrades to the infrastructure such as new transformers, upgrades to energy supplier cabling and supply lines which the building owner pays without any direct financial benefit, also the cost of electricity is much higher than gas which makes it unattractive model to implement.

unproven/untested technology that have been recommended by government, but were proven later on that it's not achieving the results.

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

Hotels

**54 Office Buildings**

Not answered

**55 Please specify**

Not answered

**56 Office Tenancies**

Not answered

**57 Please specify**

Not answered

**58 Hotel**

Sale or lease

- 59 Please specify  
Not answered
  
- 60 Shopping Centres  
Not answered
  
- 61 Please specify  
Not answered
  
- 62 Data Centres  
Not answered
  
- 63 Please specify  
Not answered
  
- 64 Public Hospitals  
Not answered
  
- 65 Please specify  
Not answered
  
- 66 Residential Aged Care  
Not answered
  
- 67 Please specify  
Not answered
  
- 68 Retirement Living  
Not answered
  
- 69 Please specify  
Not answered



- 70 Warehouses  
Not answered
- 71 Please specify  
Not answered
- 72 Cold Stores  
Not answered
- 73 Please specify  
Not answered
- 74 Schools  
Not answered
- 75 Please specify  
Not answered
- 76 Retail Stores  
Not answered
- 77 Please specify  
Not answered
- 78 Higher Education  
Not answered
- 79 Please specify  
Not answered
- 80 Supermarkets  
Not answered

- 81 Please specify  
Not answered
- 82 Private Hospitals  
Not answered
- 83 Please specify  
Not answered
- 84 Medical Centres  
Not answered
- 85 Please specify  
Not answered
- 86 Other [e.g. Galleries/sport facilities]  
Not answered
- 87 Please specify  
Not answered
- 88 Office Buildings  
Not answered
- 89 Please specify  
Not answered
- 90 Office Tenancies  
Not answered
- 91 Please specify  
Not answered

**92** Hotels  
Disclosure on Government Register  
Disclosure on real estate advertisement

**93** Please specify  
Not answered

**94** Shopping Centres  
Not answered

**95** Please specify  
Not answered

**96** Data Centres  
Not answered

**97** Please specify  
Not answered

**98** Public Hospitals  
Not answered

**99** Please specify  
Not answered

**100** Residential Aged Care  
Not answered

**101** Please specify  
Not answered

**102** Retirement Living  
Not answered

**103** Please specify

Not answered

**104** Warehouses

Not answered

**105** Please specify

Not answered

**106** Cold Stores

Not answered

**107** Please specify

Not answered

**108** Schools

Not answered

**109** Please specify

Not answered

**110** Retail Stores

Not answered

**111** Please specify

Not answered

**112** Higher Education

Not answered

**113** Please specify

Not answered

**114** Supermarkets

Not answered

**115** Please specify

Not answered

**116** Private Hospitals

Not answered

**117** Please specify

Not answered

**118** Medical Centres

Not answered

**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

Not answered