## Commercial Building Disclosure (CBD) Expansion Consultation

#### Take the survey

Climate

Response received at:

September 6, 2024 at 01:19 PM GMT+9:30

Response ID: sbm305b8bb1f453cb4b8d721

- 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



6 Last name



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
office tenancy
shopping 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?

Who is most interested in your buildings' energy use? building manager / facility manager ownership [owner/board/shareholder/partners]

26 If other, please specify

Not answered

Yes

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.

#### 29 If other, please specify

Not answered

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

#### 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

of commercial buildings in line with the suggested road map (see discussion paper for a description of the road map)?

Expansion focus should be on sectors accounting for significant emission. Including small tenancies before we tackle some of the larger emitters would not give the bang for the

tenancies before we tackle some of the larger emitters would not give the bang for the buck. If we are including tenancies in mandatory disclosure program through tenancy NABERS ratings, Can CBD replace the TLA which is an outdated tool and has insignigicant impact on efficiency and emission reduction.

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

More energy consciousness and awareness

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]
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

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?
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

TLA is an outdated tool. Assessment doesn't drive efficiency outcome. It's not a great measure of tenancy performance as it excludes the energy component.

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

#### 50 Further comments

Not answered

#### 51 Provide reasons

Not answered

#### **52** Provide reasons

This would have buildings/owners trying to find loopholes due to potential penalty for poor performance.

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

Office Buildings

Office Tenancies

## 54 Office Buildings

Sale or lease of building space of 1000 m2 or more

#### 55 Please specify

Not answered

#### 56 Office Tenancies

Every 24 months

## 57 Please specify

Not answered

#### 58 Hotel

Not answered

## 59 Please specify

#### 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

#### 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

#### 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

Disclosure on Government Register

Disclosure on website

Disclosure on real estate advertisement

## 89 Please specify

Not answered

#### **90** Office Tenancies

Disclosure on Government Register

Disclosure on website

## 91 Please specify

Not answered

92

#### Hotels

Not answered

## 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

## 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

#### 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?

Yes

# 124 Have you removed any identifying information from your submission? Yes

**125** Upload a submission CBD\_Consultation.726a1a8f.docx

## 126 Upload supporting file