# Commercial Building Disclosure (CBD) Expansion Consultation

#### Take the survey

Climate

Response received at: September 23, 2024 at 03:11 PM GMT+9:30

Response ID: sbm30b37e759158e57fd6c9f

- 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

- 9 Who are you answering on behalf of? Organisation
- 10 Organisation name
- 11 What best describes you or your organisation? Building manager
- 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) 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 office tenancy shopping centre warehouse cold store

- 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? ownership [owner/board/shareholder/partners]
- 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?

Be stricter and quicker to act on non-compliance. Review the usefulness of the TLA component of the BEEC, as it is not as well known as the NABERS rating and less useful for tenants.

- 33 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)? It should be expanded sooner rather than later, but carefully considering the nuances of

each sector. Some sectors might be more appropriate to have the renewal requirement

longer than 1 year.

- 36 What do you see are the key opportunities and benefits to expanding the coverage of the CBD Program? Educates tenants and owners about energy efficiency.
- 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
- **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? Warehouse and Cold stores - the rating is a reflection of tenant activity, rather than the building efficiency. A lot of buildings will also not be ratable due to manufacturing facilities.

Shopping centres - there are a lot of different type of shopping centre comparisons and the tool is very sensitive to specific variables. This can create very varied rating results based on the building configuration, what kind of tenants the building has.

Apartments - Cost would be prohibitive as the strata committee would likely not agree to pay. It might make sense to have 2 or 3 year validity period to reduce number of times to be completed.

Office tenancies - Annual review is unnecessary and costly since the tenancy would not have changes made unless there was a change in fitout. It would make sense to have a longer validity period for this rating tool.

- 40 In addition to the NABERS Energy rating, select any other information that should be disclosed Other
- 41 If other, please specify

Electricity, gas, diesel usage explicitly stated.

- 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 All buildings should be included if possible rather than it being determined by the type of structure.
- 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)? Other

#### 46 Please specify

Office tenancy NABERS rating measures also the tenant activity, so does not aid a new tenant in determining the efficiency of a space. TLA however does have weaknesses in the way it is assessed so is an approximation of the lighting efficiency of a spaces.

#### 47 Provide reasons Not answered

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 a need to set minimum energy performance standards to ensure that buildings that do not adequately respond through disclosure make improvements

#### 49 Please specify

#### 50 Further comments

It should be a high ceiling where low performing buildings would actually benefit cost wise by upgrading the efficiency of the building and the MEPS is a way to educate laggards.

#### 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
Shopping Centres
Warehouses
Cold Stores
Retail Stores
Other [e.g. Galleries/sport facilities]

#### 54 Office Buildings

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

#### 55 Please specify Not answered

- 56 Office Tenancies Other
- 57 Please specify Every 5 years, similar to TLA
- 58 Hotel

- 59 Please specify Not answered
- 60 Shopping Centres Sale or lease
- 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

- 70 Warehouses Sale or lease
- 71 Please specify Not answered
- 72 Cold Stores Sale or lease
- 73 Please specify Not answered
- 74 Schools Not answered
- 75 Please specify Not answered
- 76 Retail Stores Every 24 months
- 77 Please specify Not answered
- 78 Higher Education Not answered
- 79 Please specify Not answered

#### 80 Supermarkets

- 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] Every 24 months
- 87 Please specify Not answered
- 88 Office Buildings Disclosure on Government Register Disclosure on real estate advertisement Disclosure on website
- 89 Please specify Not answered
- **90** Office Tenancies Disclosure on Government Register
- 91 Please specify

Not answered

- 92 Hotels Not answered
- 93 Please specify Not answered
- **94** Shopping Centres Disclosure at premises Disclosure on website Disclosure on real estate advertisement
- 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

102 Retirement Living

Not answered

#### **103** Please specify

Not answered

#### 104 Warehouses

Disclosure on real estate advertisement Disclosure on Government Register Disclosure on website

#### **105** Please specify

Not answered

#### **106** Cold Stores

Disclosure on Government Register Disclosure on website Disclosure on real estate advertisement

#### **107** Please specify

Not answered

#### 108 Schools

Not answered

#### **109** Please specify

Not answered

110 Retail Stores

Disclosure at premises

#### 111 Please specify

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] Disclosure at premises

**121** Please specify Not answered

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

- 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