

# Commercial Building Disclosure (CBD) Expansion Consultation

## Take the survey

Climate

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Response received at:

June 19, 2024 at 05:00 PM GMT+9:30

Response ID:

sbm2ec57ff8ba51131e09c0e

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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?  
Individual or individuals
- 10 Organisation name  
Not answered
- 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  
shopping centre  
office tenancy  
warehouse  
other
- 23 If other, please specify  
apartment
- 24 If you are responding about a particular building, does that building currently have a National Australian Built Environment Rating System (NABERS) rating?  
Not applicable
- 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?

Subsidised ratings for first time raters

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?

- Provide more case studies and results on other building types other than office buildings to further enhance the adoption of NABERS rating in other sectors.

- High NABERS rating result are linked to valuation uplift in office buildings but not in other asset classes. If the program could associate improve valuation with high NABERS rating in non-office assets that could improve NABERS adoption.

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

able to know and reduce the buildings carbon emissions

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

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

**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)?

- NABERS expansion roadmap should include office tenancy occupying greater than a certain area threshold. There are retail stores in the roadmap but not office tenancy.
- MEPS (minimum star rating) would be tricky for buildings with high vacancy. I've recently seen an office building energy rating dropped from 2.5 star to 0 star when the anchor tenant moved out. Please look into some scenarios before this is implemented.
- TLA for large retail buildings will be difficult as there will be many display/feature lightings in the asset. Please take this into account when considering if TLA is required.
- Supportive of Scope 1 disclosure; however, refrigerants top-up amount to be used instead of a default leakage rate in this disclosure. If there is not leak detected the leakage rate should be 0%.

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

- More coverage to the non-office assets which will drive conversation on energy efficiency and upgrade works to improve the rating and result in emission reduction.
- Expedited urgency of the upgrade works related to energy efficiency with CBD program.

**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?

Poor rating of building

Costs associated with upgrading building to improve star rating

Having adequate time to prepare for changes

Costs of increased regulation [Fees and charges]

**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  
The Rules is fair to all regardless of the ownership.
- 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  
If office tenancies rating covers greater than a threshold (greater than x% of total NLA), TLA shouldn't be required as there is a double up. However, if the office tenancy rating does not apply because the tenancies are below the area threshold, TLA is required for the office rating.

- 47 Provide reasons  
TLA would be covered within the tenancy CBD disclosure. There is no need to double up.
- 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  
As per previous comment, MEPS (minimum star rating) will be difficult for buildings with high vacancy.
- 53 For the following two questions select the building types you wish to provide feedback on:  
Office Buildings  
Office Tenancies  
Shopping Centres  
Warehouses  
Retail Stores
- 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**

Not answered

**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

Not answered

**70** Warehouses

Sale or lease

**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

Every 12 months

**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**

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

**89 Please specify**

Not answered

**90 Office Tenancies**

Disclosure on real estate advertisement  
Disclosure on Government Register

**91 Please specify**

Not answered

**92 Hotels**

Not answered

**93 Please specify**

Not answered

**94 Shopping Centres**

Disclosure on Government Register  
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**

Not answered

**102 Retirement Living**

Not answered

**103 Please specify**

Not answered

**104 Warehouses**

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

**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**

Disclosure on Government Register

Disclosure on real estate advertisement

**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