



**APDCA Comments to DCCEEW's Consultation on the Proposed Expansion of the CBD Program**

**12 September 2024**

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### **Introduction**

The Asia-Pacific Data Centre Association (APDCA) appreciates the opportunity to provide comments to the Department of Climate Change, Energy, the Environment and Water on the proposed expansion of the Commercial Building Disclosure Program.

### **Statement of Interest**

The APDCA brings together leading commercial data centre operators in the Asia-Pacific to shape policy pathways and drive informed discussion about the systems and infrastructure needed to build a secure and sustainable digital future.

Data centres (DCs) are foundational infrastructures supporting AI and other digital technologies and are key components in the pursuit of a green, AI-powered digital economy. APDCA seeks to be a champion of sustainable practices for the data centre industry through the efficient use of renewable resources, and we seek to work with all stakeholders to promote and implement sustainable practices.

### **General Comments**

As an association comprising of eminent members of the data centre industry across the region, the APDCA would like to provide the following general comments to the consultation on the expansion of the Commercial Building Disclosure (CBD) Program.

APDCA commends and supports DCCEEW's interest and effort to establish a consistent and effective framework to measure and enhance energy use transparency. APDCA would like to highlight concerns to the proposed approach to extend the CBD program to complement the voluntary disclosure of PUE by DC operators.

CIE's 2019 report highlighted that there was insufficient evidence to justify an expansion of the CBD Program to cover DCs and recommended that DCs should not be included under the CBD Program. Several reasons and issues, such as the dynamism and constant evolution of DCs and a competitive interest to manage energy costs, are still relevant today.

Should the CBD Program be expanded, APDCA proposes that the CBD Program only be applied to new DC facilities, and that the disclosure would only be required when signing a new customer contract or when requested by a potential customer. This implementation would help the CBD Program accommodate DC market dynamics, minimise resulting disruptions and unnecessary additional costs to existing DC facilities, and yet allow for the Program to account for the potential increased power demand by emerging technologies such as AI.

In addition, should the CBD Program be expanded, APDCA recommends that the Program should only require the disclosure of the NABERS energy rating and the NABERS Renewable Energy Indicator, as these would be the most relevant and useful metrics for DC customers and stakeholders. These metrics would provide a good measure of the energy efficiency and

renewable energy use of DCs. Other information may be irrelevant or negligible to DC energy performance and should not be a requirement for disclosure, such as Scope 1 emissions from on-site activities.

To the question of whether to use minimum energy performance standards (MEPS), APDCA does not support the use of MEPS for DCs, as APDCA believes that MEPS would neither be suitable nor effective for DCs. DCs describe facilities that vary widely in variety and complexity, and this would make it difficult to apply the MEPS in a uniform and fair manner. In addition, DCs are already self-incentivised to achieve high energy efficiency and sustainability levels due to market forces and customer demands. APDCA recommends that interventions in the DC sector be done cautiously and carefully to avoid any unintended impact on the reliability and security of DCs, given their importance as digital infrastructures in Australia.

### **Conclusion**

APDCA is committed to doing our part in this endeavour to develop good public policies that work for everyone. APDCA believes that reducing environmental impact requires a concerted effort by the entire community including operators, governments, investors, suppliers, and people to protect our collective future. As for DCCEEW's proposal to include DCs into the CBD Program, APDCA does not see the necessity to include DCs as DCs are mature and self-incentivised in ensuring their energy efficiency, and urges DCCEEW to carefully consider the concerns, existing regulations, and the nature of DCs to minimise disruptions to DC operations.

Best Regards,

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