

Commercial Building Disclosure (CBD) Expansion Consultation

Take the survey

Climate

Response received at:
September 16, 2024 at 10:41 AM GMT+10

Response ID:
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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
- 3 Published name
CIBSE
- 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
CIBSE
- 11 What best describes you or your organisation?
Peak body representative
- 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
shopping centre
data centre
warehouse
cold store
residential aged care
retirement living
no specific building
- 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?
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]
consumers
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?

Other

29 If other, please specify

NABERS does not apply to all buildings and the CBD program is presently quite limited in its reach

30 What might be needed to help you overcome those barriers?

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?

Yes - it should be expanded to incorporate more building types, and most importantly it should be expanded to include office tenancies (above 250m2 perhaps)

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

other

- 34 If other, please specify
Creating competitive tension. Improving transparency
- 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)?
Fully supportive - especially with respect to office tenancies
- 36 What do you see are the key opportunities and benefits to expanding the coverage of the CBD Program?
Just by knowing where you stand, building owners cant help but look to improve their environmental performance. A great way to drive meaningful improvement at very low cost
- 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?
Challenges to improve rating in a heritage building
Costs associated with upgrading building to improve star rating
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?
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

Other

41 If other, please specify

Waste and water are two NABERS Ratings that should also be considered

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

Better environmental performance is not limited by ownership type

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)?

Yes

46 Please specify

Not answered

47 Provide reasons

The tenancy rating is heavily influenced by the energy consumed by the lighting. Maintaining the TLA will give tenants insight to a major part of their energy consumption.

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

This is an area fraught with danger. MEPS is relatively straightforward with most types of new building (some new buildings will be higher energy users by virtue of needs to happen in them - and obviously MEPS needs to accommodate such situations) but existing buildings are not always amenable to high performance upgrades, so its important that we don't create a situation where assets are inadvertently stranded (or worse - eg demolished and rebuilt with a significant embodied carbon penalty).

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

Office Buildings

Shopping Centres

Residential Aged Care

Cold Stores

Higher Education

Medical Centres

Office Tenancies

Data Centres

Retirement Living

Schools

Supermarkets

Other [e.g. Galleries/sport facilities]

Private Hospitals

Retail Stores

Warehouses

Public Hospitals

Hotels

54 Office Buildings
Every 12 months

55 Please specify
Not answered

56 Office Tenancies
Every 12 months

57 Please specify
Not answered

58 Hotel
Every 12 months

59 Please specify
Not answered

60 Shopping Centres
Every 12 months

61 Please specify
Not answered

62 Data Centres
Every 12 months

63 Please specify
Not answered

64 Public Hospitals
Every 12 months

- 65 Please specify
Not answered

- 66 Residential Aged Care
Every 12 months

- 67 Please specify
Not answered

- 68 Retirement Living
Every 12 months

- 69 Please specify
Not answered

- 70 Warehouses
Every 12 months

- 71 Please specify
Not answered

- 72 Cold Stores
Every 12 months

- 73 Please specify
Not answered

- 74 Schools
Every 12 months

- 75 Please specify
Not answered

- 76 Retail Stores
Every 12 months

- 77 Please specify
Not answered

- 78 Higher Education
Every 12 months

- 79 Please specify
Not answered

- 80 Supermarkets
Every 12 months

- 81 Please specify
Not answered

- 82 Private Hospitals
Every 12 months

- 83 Please specify
Not answered

- 84 Medical Centres
Every 12 months

- 85 Please specify
Not answered

- 86 Other [e.g. Galleries/sport facilities]
Every 12 months

87 Please specify

Not answered

88 Office Buildings

Disclosure on Government Register

Disclosure at premises

Disclosure on website

Disclosure on real estate advertisement

89 Please specify

Not answered

90 Office Tenancies

Disclosure on Government Register

Disclosure at premises

Disclosure on website

91 Please specify

Not answered

92 Hotels

Disclosure on Government Register

Disclosure at premises

Disclosure on website

Disclosure on booking sites

Disclosure on room booking

93 Please specify

Not answered

94 Shopping Centres

Disclosure on Government Register

Disclosure at premises

Disclosure on website

95 Please specify

Not answered

96 Data Centres

Disclosure on Government Register

Disclosure at premises

Disclosure on website

97 Please specify

Not answered

98 Public Hospitals

Disclosure on Government Register

Disclosure at premises

Disclosure on website

99 Please specify

Not answered

100 Residential Aged Care

Disclosure on Government Register

Disclosure at premises

Disclosure on website

Disclosure on real estate advertisement

101 Please specify

Not answered

102 Retirement Living

Disclosure on Government Register

Disclosure at premises

Disclosure on website

103 Please specify

Not answered

104 Warehouses

Disclosure on Government Register

Disclosure at premises

Disclosure on website

105 Please specify

Not answered

106 Cold Stores

Disclosure on Government Register

Disclosure at premises

Disclosure on website

107 Please specify

Not answered

108 Schools

Disclosure on Government Register

Disclosure at premises

Disclosure on website

109 Please specify

Not answered

110 Retail Stores

Disclosure on Government Register

Disclosure at premises

Disclosure on website

111 Please specify

Not answered

112 Higher Education

Disclosure on Government Register

Disclosure at premises

Disclosure on website

113 Please specify

Not answered

114 Supermarkets

Disclosure on Government Register

Disclosure at premises

Disclosure on website

115 Please specify

Not answered

116 Private Hospitals

Disclosure on Government Register

Disclosure at premises

Disclosure on website

117 Please specify

Not answered

118 Medical Centres

Disclosure on Government Register

Disclosure at premises

Disclosure on website

119 Please specify

Not answered

120 Other [e.g. Galleries/sport facilities]

Disclosure on Government Register

Disclosure at premises

Disclosure on website

121 Please specify

Not answered

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

By all reasonable measures there can be little doubt that the CBD Scheme has helped drive a significant improvement in the energy efficiency of commercial office buildings. From a Government perspective this has come at minimal cost, and whilst many building owners were initially reticent about their compliance costs, the successive improvements in building energy ratings clearly demonstrates the benefits these owners now seek. There is little reason to doubt that this improvement in performance can be achieved in other building sectors. Public disclosure shines a light on actual performance, and as a consequence people will find ways to improve.

We do note that the discussion paper was very light when it came to mandating tenant energy performance reporting. This is regrettable. Tenants once accounted for 35% of total building energy usage. As 'base' buildings have become better performers we have seen the tenant proportion of energy use increase to around 50%, suggesting there is a huge opportunity for improvement in this area. Tenant ratings can be conducted in tandem with a base building rating, at quite low cost (using the co-assess methodology) so we suggest that initially all tenancies over say 500m² NLA should be compelled to disclose their NABERS Energy Rating on an annual basis.

From an operational carbon perspective, the implications of waste and water should not be ignored. There are compelling arguments to expand disclosure to these areas and we would certainly support such moves.

123 Would you like to upload a document?

Not answered

124 Have you removed any identifying information from your submission?

Not answered

125 Upload a submission

Not answered

126 Upload supporting file

Not answered