

Commercial Building Disclosure (CBD) Expansion Consultation

Take the survey

Climate

Response received at:
September 13, 2024 at 02:56 PM GMT+9:30

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
[REDACTED]
- 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
Yarra City Council
- 11 What best describes you or your organisation?
Local or State Government
- 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:
hotel
shopping centre
data centre
office building
warehouse
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?
Not applicable
- 25 Who is most interested in your buildings' energy use?
governments
- 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?
Not answered
- 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)?
Yarra City Council's Sustainability team are supportive of the expansion of the Commercial Building Disclosure (CBD) program. We recognise the importance of

addressing energy use and carbon emissions in existing buildings and welcome the initiative. The CBD program is an important aspect of the National Trajectory to Low Energy Buildings which aligns with The City of Yarra's Climate Emergency Plan, Council Plan and organisational priorities.

We welcome this opportunity to comment and identify a number of opportunities to enhance the proposed expansion of the program that we have highlighted here in this brief response.

The types of buildings identified are suitable and appropriate, however the following recommendations have been made for consideration by the CBD Expansion review process.

1. Include private hospitals in the same timeline as public hospitals. We believe that both public and private hospitals should be aligned to commence energy reporting in 2025 and included within 'Group 2' mapped out in the expansion roadmap. Many private hospital owners also own Aged Care and retirement living facilities so they would otherwise be reporting on those one year earlier than the hospital assets in their portfolios, that can typically use more energy. Hospitals are significant energy consumers and should be encouraged to undertake energy reporting and take advantage of the benefits of energy management that comes with it.

2. We are supportive of the expansion including different ownership structures. The owner of the property shouldn't determine what they have to disclose, where they are publicly or privately owned, and all properties of similar types should be disclosing the same information.

3. Mandatory disclosure should not be restricted to commercial buildings and should include residential buildings as well. Inclusion of residential building was originally intended when the mandatory disclosure initiative was first mapped out by the former COAG energy efficiency policy agreement. Leaving residential buildings out of this expansion process is a missed opportunity to assist residents, both owners and tenants, to undertake improved energy efficiency and energy management actions. Existing residential buildings have few incentives or requirements to manage and reduce energy consumption, largely excluded from benefits of reform to the National Construction Code.

This is particularly important in the current economic climate where the cost-of-living pressures include rising energy costs. Prospective tenants, particularly, should have the benefit of understanding comparative energy use of the rental market and be empowered to make informed decisions regarding the potential energy use of rental homes.

Mandatory energy disclosure of residential buildings at the point of sale or lease would be a valuable addition to the current proposed CBD Expansion Roadmap.

36 What do you see are the key opportunities and benefits to expanding

the coverage of the CBD Program?

Energy ratings should be included in all relevant advertising material of a building for sale or for lease (including online advertising), in addition we recommend the CBD team consider options for disclosure of energy rating information on business websites, annual financial and company reporting documentation and at annual general meetings. In addition, non-residential building should display energy ratings on primary building entrances, in a similar manner to the European energy rating system Basic guidance on how and where to display energy ratings should be developed and provided by the CBD team.

Display of energy ratings should be mandatory and updated on an annual basis.

- 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

- 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

Ownership structure shouldn't determine the reporting requirements and doesn't change the carbon impact of the building. If you own a property, you should be responsible for reporting on and improving the energy rating.

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

Yes, this brings material improvements to energy use and is ultimately going to save many smaller businesses in older buildings significant money.

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

Not answered

50 Further comments

Mandatory minimum energy standards (MEPS) for all existing buildings is supported. Given the significant performance gap between new and older buildings, some form of

regulation should be considered carefully by the CBD Expansion team. Incentives such as Federal and State solar rebates and free energy efficiency equipment funded by initiatives like the Victorian Energy Efficiency Certificates, can only go so far.

However, given the potential challenges in shifting to a MEPS system for existing buildings, careful introduction of this type of initiative should be undertaken, including;

- Gradual introduction of building MEPS from large scale buildings down to small scale, with a clear timeline mapped out over a number of years.
- Supportive training and education across various section including property management, real estate industry and others.

MEPS for all buildings could assist in the following ways;

- Reduce fuel poverty and cost-of-living pressures for Australian households.
- Reduce operational overheads and increase productivity for Australian businesses.
- Assist in the transition to renewable energy and zero carbon energy networks by reducing energy demand.
- Assist inform the rental and sales market of buildings.
- Drive investment in local jobs and employment opportunities in energy efficiency and energy management.

51 Provide reasons

Not answered

52 Provide reasons

Not answered

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

Shopping Centres

Residential Aged Care

Medical Centres

Private Hospitals

Supermarkets

Schools

Retirement Living

Data Centres

Hotels

Warehouses

Retail Stores

54 Office Buildings

Not answered

55 Please specify

Not answered

56 Office Tenancies

Not answered

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

Not answered

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

Sale or lease

71 Please specify

Not answered

72 Cold Stores

Not answered

73 Please specify

Not answered

74 Schools

Every 12 months

75 Please specify

Not answered

76 Retail Stores

Sale or lease

77 Please specify

Not answered

78 Higher Education

Not answered

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]

Not answered

87 Please specify

Not answered

88 Office Buildings

Not answered

89 Please specify

Not answered

90 Office Tenancies

Not answered

91 Please specify

Not answered

92 Hotels

Disclosure at premises

Disclosure on website

Disclosure on real estate advertisement

Disclosure on booking sites

Disclosure on room booking

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**
Disclosure on website
Disclosure on real estate advertisement
- 97 Please specify**
Not answered
- 98 Public Hospitals**
Not answered
- 99 Please specify**
Not answered
- 100 Residential Aged Care**
Disclosure on real estate advertisement
Disclosure on website
Disclosure at premises
- 101 Please specify**
Not answered
- 102 Retirement Living**
Disclosure at premises
Disclosure on website
- 103 Please specify**
Not answered
- 104 Warehouses**
Disclosure at premises
Disclosure on website
Disclosure on real estate advertisement
- 105 Please specify**

Not answered

106 Cold Stores

Not answered

107 Please specify

Not answered

108 Schools

Disclosure at premises

Disclosure on website

109 Please specify

Not answered

110 Retail Stores

Disclosure at premises

Disclosure on real estate advertisement

111 Please specify

Not answered

112 Higher Education

Not answered

113 Please specify

Not answered

114 Supermarkets

Disclosure at premises

Disclosure on real estate advertisement

115 Please specify

Not answered

116 Private Hospitals
Disclosure at premises
Disclosure on website

117 Please specify
Not answered

118 Medical Centres
Disclosure at premises
Disclosure on website

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

As mentioned in the CBD Expansion discussion paper, including renewable energy in the energy ratings is supported for all commercial building types (Groups 1 to 4) as well as residential buildings. We recommend that commercial entities owning or leasing building should include both onsite solar generation contribution, disclosed in annual energy generation (MJ or kWh) as well as offsite renewable energy purchasing arrangements such as Green Power, Power Purchase and Offtake Agreements. The NABERS Renewable Energy Indicator would be valuable and those supporting the broader transition to net zero.

Residential buildings could also include mandatory disclosure of total rooftop solar kW capacity and point of sale or lease in a simple format.

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