

Submission on Mandatory Energy Efficiency Reports for Commercial Office Buildings

The preferred Government option is for mandatory disclosure accompanied by an EEAR. In general, I am supportive of this position as mandatory disclosure will increase the focus on sustainability performance of the building for business decision makers. However, I also feel not enough weight has been given to the voluntary framework. Given that businesses will be dealing with increased costs directly and through the supply chain as a result of the CPRS, mandatory legislation will impose further costs where there will already be significant triggers for change. Voluntary participation in sustainability codes has been excellent due to businesses undertaking sustainability initiatives as part of core business for example, the uptake of signatories to the National Packaging Covenant and the number of businesses voluntarily being members of and undertaking rating from the Green Building Council of Australia.

I note that NABERS is the only tool examined and proposed for use, and that the program will be expanded to buildings other than commercial office buildings in due course.

If, as stated, the ultimate goal of the regulation is to reduce impact on and impact from climate change, it is vital that other more holistic and sophisticated tools are examined for use in this program. The Green Building Council of Australia operates Australia's only national voluntary comprehensive environmental rating system for buildings - Green Star. I strongly advocate that the tool for this regulation should be the Green Star Tool.

- NABERS Energy does not take advantage of the opportunity to expand knowledge of and uptake of other related climate change/sustainability aspects in the one legislative change. Such aspects include – employing accredited staff, indoor air quality, materials use, land use, water conservation, proximity to transport etc that would be achieved by using a climate change/sustainability rating tool such as Green Star.
- NABERS doesn't consider embodied energy (e.g in the building materials)
- NABERS is not aligned to international best practice in green building rating – i.e LEED and International Green Building Council.
- NABERS Energy has a very narrow focus; it doesn't cover the gamut of critical sustainability issues that should be considered when building or refurbishing, and which have a direct impact on and from climate change. This is a missed opportunity to consider related and complimentary issues in the one regulatory instrument.
- NABERS doesn't go beyond electricity bill input
- There is an over-reliance on the Utilities having timely, accurate, and available consumption data. There is no onus on the utilities to supply such.
- Use of NABERS doesn't encourage training and green jobs like the Green Star tool, which awards a point for having an accredited professional on the building team.
- As commercial office buildings are only a starting point then by using NABERS there will be a duplication of work as new iterations of NABERS would be needed to deal with other kinds of commercial buildings. GBCA

already has a multitude of tools: office, industrial, child care, retail shopping centre.

- NABERS doesn't have a design element to assist new building developers to build more sustainable buildings from the outset. Green Star has separate design and as built tools.
- GBCA Green Star compliments other state and federal legislation, such as BPCA, POEO, Stimulus Package – green jobs creation, Water Plan.
- Recently refurbished buildings can be accounted for under the Design tool
- The cost of a NABERS assessment is only \$3000 approx, whereas an energy audit is upwards from \$10,000. What kind of quality is assured with a \$3000 NABERS rating?

Appendix: What is Green Star?

- Green Star is Australia's leading holistic environmental rating tool for buildings.
- Green Star recognises and rewards environmental leadership in the top 25% of the market.
- Green Star was created for the property industry to:
 - Establish a common language;
 - Set a standard of measurement for green buildings;
 - Promote integrated, whole-building design;
 - Recognise environmental leadership;
 - Identify building life-cycle impacts; and
 - Raise awareness of green building benefits.

What does Green Star reward credits for?

- Management

Improves the adoption of sustainable development principles from project conception through to design, construction, commissioning, tuning and operation.

- Indoor Environment Quality

Concerned with occupant wellbeing and performance by addressing the HVAC system, lighting, occupant comfort and pollutants.

- Energy

Credits target reduction of greenhouse emissions from building operation by addressing energy demand reduction, use efficiency, and generation from alternative sources eg solar, wind, cogeneration etc

- Transport

Credits reward the reduction of demand for individual cars by both discouraging car commuting and encouraging use of alternative transportation.

- Water

Credits address reduction of potable water through efficient design of building services, water reuse and substitution with other water sources (specifically rainwater).

- Materials

Credits targets resource consumption through material selection, reuse initiatives and efficient management practices.

- Land Use & Ecology

Credits address a project's impact on its immediate ecosystem, by discouraging degradation and encouraging restoration of flora and fauna.

- Emissions

Credits address point source pollution from buildings & building services to the atmosphere, watercourse, and local ecosystems.

- Innovation

Green Star seeks to reward marketplace innovation that fosters the industry's transition to sustainable building.

What Green Star tools have or are being developed?

- Office Design
- Office As Built
- Office Interiors
- Office Existing
- Retail
- Healthcare
- Education
- Multi Unit Residential
- Mixed Use
- Industrial
- Public Buildings
- Precincts

More than 100 buildings in Australia have already been certified Green Star with another 500 more are registered and awaiting assessment and certification.

Regards,

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