

7 November 2019

Phil Manners
Director
The Centre for International Economics
Level 7, 8 Spring Street
SYDNEY NSW 2000

pmanners@thecie.com.au

Dear Phil

INDEPENDENT REVIEW OF THE COMMERCIAL BUILDING DISCLOSURE PROGRAM – DRAFT REPORT

As a strong supporter of the Commercial Building Disclosure (CBD) program, the Sustainable Built Environment Council (ASBEC) welcomes the release of the *Independent Review of the Commercial Building Disclosure Program – Draft Report*.

ASBEC is a body of peak organisations committed to a sustainable built environment in Australia. ASBEC's membership consists of industry and professional associations, non-government organisations and government observers who are involved in the planning, design, delivery and operation of our built environment. ASBEC has twenty-seven industry members, including the Property Council of Australia, Green Building Council of Australia, Australian Institute of Refrigeration, Air Conditioning and Heating, Energy Efficiency Council and Facilities Management Association of Australia.

Our [Low Carbon, High Performance](#) report outlines the great potential of Australia's built environment to reduce emissions and save energy, and highlights the importance of the Commercial Building Disclosure (CBD) Program in driving improvements in the large office sector.

We commend the comprehensive scope of the Draft Report and are pleased that the successes of the CBD Program have been acknowledged in a way that provides context for its continuation and expansion.

We support the following Recommendations in the Draft Report:

- 1: The CBD Program continues for office buildings.
- 2: The impact the CBD Program is having in offices can be increased, through funding programs aimed at low-NABERS energy star-rated buildings.
- 3: The CBD Program should be extended to office tenancies.
- 5: Mandatory disclosure of energy performance should be expanded to hotels.
- 7: Disclosure of energy performance for apartment buildings should be investigated in detail, following agreement from states and territories to undertake such an investigation.
- 8: State and territory government should agree to a detailed examination of mandatory disclosure of NABERS ratings for apartment buildings, including consideration of an appropriate legal framework.

For further detail, we refer to submissions from ASBEC members including the Energy Efficiency Council, Property Council of Australia and Green Building Council of Australia.

We look forward to engaging further as this review is finalised.

Yours Sincerely



Suzanne Toumbourou
Executive Director

