

6 November 2019

Mr Phil Manners  
Director  
The Centre for International Economics (The CIE)  
Level 7, 8 Spring Street  
SYDNEY NSW 2022

By email: [pmanners@thecie.com.au](mailto:pmanners@thecie.com.au)

Dear Phil,

**Draft Report: Independent Review of Commercial Building Disclosure (CBD) Scheme**

Further to my previous letter to you, I write in relation to The CIE's Draft Report on the review of the CBD scheme.

The National Retail Association (NRA) is the key national industry and advocacy organisation that represents the interests of retailers, and our membership includes small and larger national retailers. We engage across several policy and regulatory issues including industrial relations, retail tenancy legislation, consumer issues and retail crime. The NRA also partners with Governments on regulatory issues, such as the rolling-out of plastic bag bans across several jurisdictions.

The NRA supports The CIE's recommendation that the CBD scheme is not extended to shopping centres. We also note that The CIE's finding that an extension would result in a net cost of \$17 million.

We recommend that The CIE formalises this recommendation in its Final Report to the Minister for Energy, the Hon Angus Taylor. We understand that this issue may also be considered by the COAG Energy Council. As we suggested in our previous letter, we urge The CIE to recommend that there is no further consideration of the scheme's extension into the future.

We also suggest The CIE emphasises that in relation to shopping centres and retail, we are an industry that is highly regulated. This includes detailed state and territory legislation under which landlords are already obliged to disclose clear and detailed energy information to prospective, sitting and renewing tenants in shopping centres. In addition, this energy information (along with other information) is estimated for each annual period and audited.

We recommend that The CIE highlights the above point and ensures it is central to the argument that we do not want or need to be subjected to unnecessary regulatory duplication, cost and red tape, and confusing



information that is of no benefit to a retailer. Parties that aren't subjected to detailed regulation often don't seem to appreciate the impact or burden of regulation, including the resources required getting caught up in unnecessary regulatory reviews, and can often trivialise key issues and make unsubstantiated claims.

Please do not hesitate to contact our Director of Policy, David Stout, on [REDACTED] or [REDACTED] to discuss this issue.

Yours sincerely

A handwritten signature in black ink, which appears to read "Dominique Lamb". The signature is written in a cursive, flowing style.

**Dominique Lamb**  
Chief Executive Officer