

8 November 2019

Stanford Harrison
The Department of the Environment and Energy

Independent review of the Commercial Building Disclosure Program

Dear Stanford,

Sydney Water strongly advocates the mandatory disclosure of water efficiency for commercial buildings and residential strata. We know from extensive audits conducted in the millennium drought that A and B-grade offices compete in the rental market, based on their building's energy rating. At lower tier rental markets, the key driver is cost, and a key consequence is the building's energy and water efficiency. For many of the same reasons and to reap many of the same benefits as mandatory energy disclosure, mandatory water disclosure should be recommended.

There is a known market failure with cooling towers in Australia and it relates to the chemical companies that are responsible for managing the risk of Legionella bacteria which have a high potential to thrive in a poorly maintained cooling tower environment. Very often no other regular maintenance is conducted on a cooling tower, other than to verify antibacterial chemical levels are being maintained. The result is a regular bias towards over dosing and over-dilution of the cooling tower water reservoir, resulting in considerable water wastage. This is a highly prevalent circumstance in a vast number of water-cooled buildings today. NABERS ratings highlight these issues and cost-efficient corrective measures are quickly adopted as a result. – 15-30% reductions in water demand have been regularly observed with no impact on the health risks of poorly maintained cooling towers. Given this water is pumped to the highest levels of a given building then treated with toxic chemicals, this is expensive water to be sent almost directly to drain.

Sydney Water also advocates inclusion of residential strata apartments into the scope of the current program given the results from its WaterFix for Strata servicing offering (leaks & retrofits). The current NABERS water ratings only cover outdoor water usage and as most of Sydney strata buildings do not have individual meters for each apartment thereby limiting the incentive for individual apartment dwellers to use water efficiently or address leaks. The high number of renters, many of them who are unwilling to raise any problems or repairs request with their property managers which impacts water and energy (hot water) usage. The average reduction in potable water use from participating building is 30% and in some buildings savings of over 35% have been achieved. The benefits of a mandatory NABERS rating for residential apartments will improve the focus of owners, tenants and strata managers on water and energy efficiency and benefits of using the NABERS rating for leasing and selling.

To discuss this submission in more detail please contact Charles Agnew on [REDACTED] or [REDACTED]

Yours sincerely



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Service Planning Manager

