



# TLA for Offices Rules review

## – Public consultation paper

## Introduction

The Commercial Buildings Disclosure (CBD) Program Tenancy Lighting Assessment (TLA) for Offices Rules are defined and administered by the Department of Industry, Science Energy and Resources (CBD Administrator). The last major TLA Rules update (version 3.0) was published in early 2016, with additional minor updates ([version 3.1](#) and an associated [TLA Ruling](#)) published in April 2020 to provide flexibility during the COVID pandemic.

## Why is the CBD Administrator updating the TLA Rules now?

The TLA Rules version 3.0 specified that TLAs were valid for five years. The first batch of five year TLAs that were certified under TLA Rules version 3.0 will begin to expire in September 2021. It is important to ensure that when TLAs for buildings are validated for another five years, the lighting assessments reflect current practice.

Feedback from stakeholders and CBD Accredited Assessors has highlighted the need for the TLA Rules to reflect shifts in the marketplace towards highly efficient LED lighting installations and updates to minimum lighting standards specified in the National Construction Code (NCC).

## What is included in the TLA Rules review?

The CBD Administrator has engaged Napier and Blakeley to review the current TLA Rules version 3.1 and provide recommendations.

The TLA Rules review is focussing on technical aspects of the TLA Rules including lamp power calculations, lighting power density grading and improving methods, diagrams, flowcharts and examples. General updates including clarifications, definitions and general readability are also covered. Broader CBD Program policy issues such as legislative and regulatory framework issues, exemptions, administrative processes and compliance processes are not covered in this review.

## Why is the CBD Administrator releasing this consultation paper?

Preliminary recommendations on TLA Rules updates were presented to CBD Accredited Assessors in May 2021 for feedback. The CBD Administrator is now seeking broader stakeholder feedback on proposals to update the method of ranking Nominal Lighting Power Density (NLPD) levels in the TLA Rules (see **Appendix B – NLPD grading band proposals**).

Two proposals have been developed that seek to better align with different lighting technologies currently in the market, while minimising confusion between ratings already in the market and those lodged under the new TLA Rules. It is proposed existing ratings will remain valid following the introduction of TLA Rules version 4.0 so as not to impose additional compliance cost on the market.



# TLA for Offices Rules review

## – Public consultation paper

### What are the next steps?

The final proposed NLPD changes will be incorporated into draft TLA Rules version 4.0 and circulated for comment in late July 2021 before being finalised and published on the [CBD website](#).

It is proposed the new TLA Rules will come into effect for all Building Energy Efficiency Certificate applications lodged after 30 September 2021.

The CBD Administrator will incorporate feedback from this public consultation into the updated version 4 TLA Rules. The CBD Administrator will aim to publish a full draft version of version 4 of the TLA Rules in July 2021, allowing CBD Accredited Assessors to begin using these Rules in their site assessments.

### How do I provide feedback?

Please send all submissions to the CBD Administrator:

1. Written responses can be sent to [info@cbd.gov.au](mailto:info@cbd.gov.au) (please ensure you enter 'TLA Rules Review' in the subject line).
2. Anonymous responses can be sent through the CBD website '[Contact Us](#)' page.
3. You can also call the CBD Program hotline (toll free) on 1800 020 131.

### When is the submission deadline?

The CBD Administrator are inviting stakeholders to provide feedback by close of business Friday 9 July 2021.

### Will my submission and my details be made public?

The CBD Administrator will not make submissions or any author's details public. As noted above, there is an option to provide anonymous feedback through the CBD website '[Contact Us](#)' page.

### Will the CBD Administrator include all the suggestions contained in my submission in future releases?

The CBD administrator will always seek to incorporate your comments where possible, while noting the diverse feedback that may be received. Consideration will prioritise submissions that focus on the key issues currently being examined in the TLA Rules. Broader feedback will be noted for future reviews.



# TLA for Offices Rules review

## – Public consultation paper

## Public consultation

### Focus questions

The CBD Administrator is seeking your comments to the following key questions:

1. In considering the NLPD grading bands proposed in Appendix A, which do you consider should be included in the updated TLA Rules and why?
2. In considering the new grading band, do you consider it should be titled 'market leading'? If not, what title could it be given?
3. If you disagree with both Proposal 1 and Proposal 2, please provide an explanation why and your proposed alternative.
4. Do you have any broader feedback or changes you would like to see in the next version of the TLA Rules?

If you have any additional questions regarding the public consultation or the proposals defined below, please call the CBD hotline on 1800 020 131 (toll free) or email [info@cbd.gov.au](mailto:info@cbd.gov.au).



# TLA for Offices Rules review

## – Public consultation paper

### Appendix A – NLPD grading bands

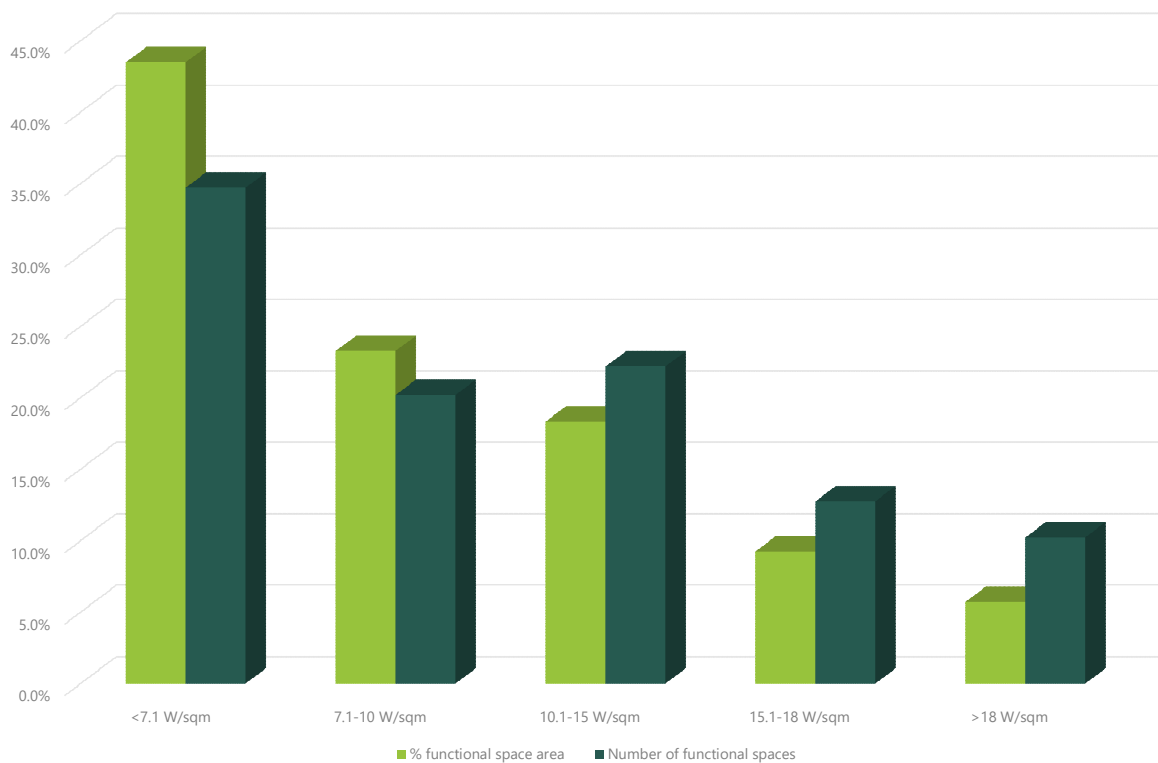
#### Current NLPD grading bands

The NLPD grading bands defined in the current (version 3.1) TLA Rules are shown below in **Error! Reference source not found.**, as they appear on Building Energy Efficiency Certificates (BEECs).

**Table 1 - Current NLPD grading bands (TLA Rules version 3.1)**

NLPD	NLPD Grade	Appearance on BEEC
7.0 W/m <sup>2</sup> or less	Excellent	Excellent
7.1 to 10.0 W/m <sup>2</sup>	Good	Good
10.1 to 15.0 W/m <sup>2</sup>	Median	Median
15.1 to 18.0 W/m <sup>2</sup>	Poor	Poor
18.1 W/m <sup>2</sup> or more	Very Poor	Very poor

**Figure 1 – Distribution of current NLPD bands**





# TLA for Offices Rules review

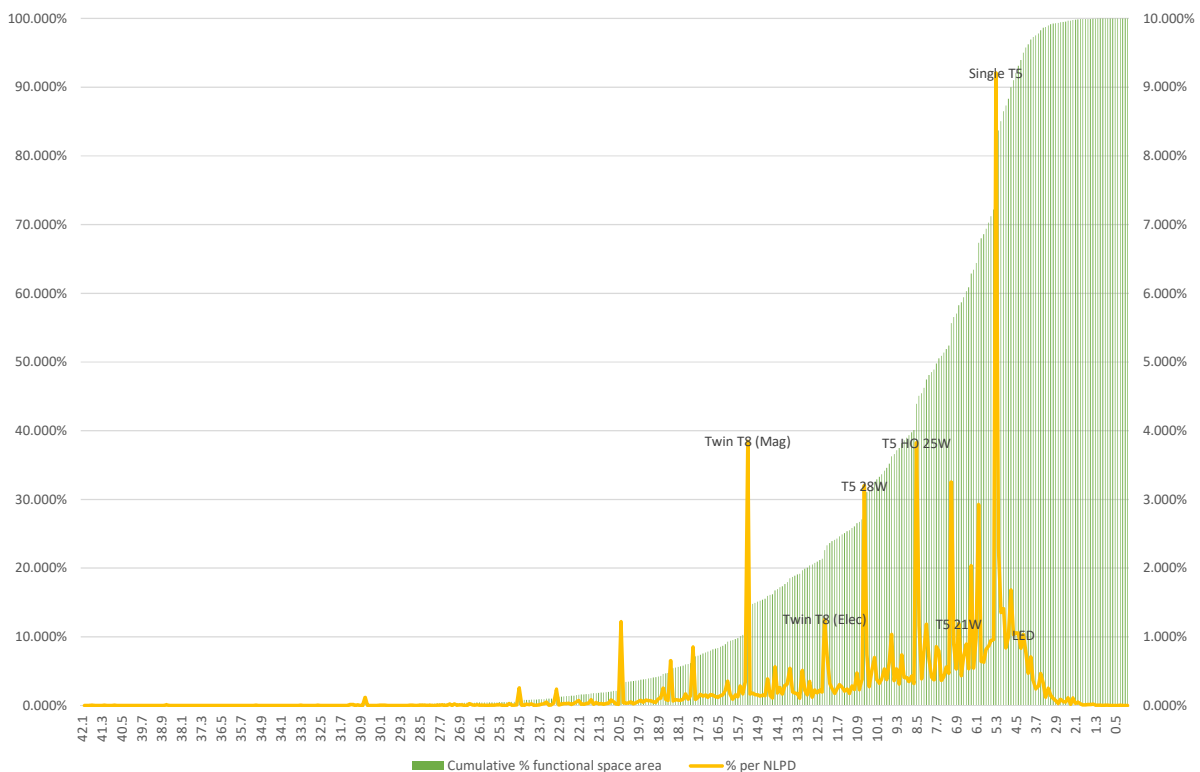
## – Public consultation paper

These NLPD grading bands segment functional spaces assessed in a TLA into different grades based on the installed lighting system power density. This NLPD grade is a general indicator of lighting system energy efficiency, and potential running costs. A 'Very Poor' system is likely to cost significantly more to run than an 'Excellent' system, assuming similar the lighting controls.

As lighting technology has improved since the TLA Rules were published in 2016, increasingly functional spaces assessed for a TLA are grading into the top 'Excellent' category. This is shown in **Error! Reference source not found.**, with more than 40% of the functional space area assessed in the past year falling into the highest possible 'Excellent' category.

Figure 2 summarises an analysis of NLPDs of common lighting technologies. Each spike in the orange '% per NLPD' graph responds to a common lighting technology present in TLAs certified in the past year through the CBD Program.

**Figure 2 - NLPD grades and lighting technology**





# TLA for Offices Rules review

## – Public consultation paper

### Proposal 1 – Adding a new ‘market leading’ band and adjusting all current NLPD bands

As per **Error! Reference source not found.** below, this proposal seeks to add a new ‘market leading’ NLPD band to account for lighting systems with an installed power density of 4.5 W/m<sup>2</sup> or less, and adjust current bands to reflect common lighting technologies in the market.

**Table 2 – Proposal 1: Adding a new ‘market leading’ band and adjusting current bands**

NLPD	NLPD Grade	Appearance on BEEC	Common lighting types
4.5 W/m <sup>2</sup> or less	market leading	Market leading	LED
4.6 to 5.5 W/m <sup>2</sup>	Excellent	Excellent	Single T5 fluorescent
5.6 to 9.0 W/m <sup>2</sup>	Good	Good	Twin T5 (multiple variants)
9.1 to 13.0 W/m <sup>2</sup>	Moderate	Moderate	Twin T5 (multiple variants)
13.1 to 17.0 W/m <sup>2</sup>	Poor	Poor	T8 fluorescent variants
17.1 W/m <sup>2</sup> or more	Very Poor	Very poor	T8 fluorescent variants

This approach is based on the analysis of lighting technology types commonly found in commercial offices tenancies, summarised in Figure 2 above.

Importantly, to achieve the highest rating of ‘market leading’ most lighting installations will need to make use of LED technology. Most T5 fluorescent installations will not reach this top grade. This will provide recognition at the top level as more spaces take advantage of higher performing technologies over time.

Buildings with existing TLAs assessed using TLA Rules version 3.0 and 3.1 will remain valid and can continue using these to certify new BEECs. If the building owner wishes to update their TLA using the newer TLA Rules with updated NLPD banding, a new TLA application can be submitted through the CBD Administrator.



# TLA for Offices Rules review

## – Public consultation paper

### Proposal 2 – New ‘market leading’ grading band only

This proposal keeps the current NLPD grading bands, but splits up the ‘Excellent’ grade with a new ‘market leading’ grading band for spaces with an NLPD of 4.5W/m<sup>2</sup> or less, as shown in **Error! Reference source not found.** below.

**Table 3 - Proposal 2: Adding a new ‘market leading’ band only**

NLPD	NLPD Grade	Appearance on BEEC
4.5 W/m <sup>2</sup> or less	market leading	Market leading
4.6 to 7.0 W/m <sup>2</sup>	Excellent	Excellent
7.1 to 10.0 W/m <sup>2</sup>	Good	Good
10.1 to 15.0 W/m <sup>2</sup>	Moderate	Moderate
15.1 to 18.0 W/m <sup>2</sup>	Poor	Poor
18.1 W/m <sup>2</sup> or more	Very Poor	Very poor

This proposal will allow for greater differentiation at the top end of the market with the new ‘market leading’ band to account for lighting systems with an installed power density of 4.5 W/m<sup>2</sup> or less. All other NLPD grading bands will be unchanged, maintaining consistency with existing TLAs certified under TLA Rules version 3.0 and 3.1.

Buildings with existing TLAs assessed using TLA Rules version 3.0 and 3.1 will remain valid and can continue using these to certify new BEECs. If the building owner wishes to update their TLA using the newer TLA Rules with updated NLPD banding, a new TLA application can be submitted through the CBD Administrator.