

Mr Gene McGlynn
Assistant Secretary, Building & Government Energy Efficiency Branch
Department of Climate Change & Energy Efficiency
Email: Gene.McGlynn@climatechange.gov.au

10 June 2011

Dear Mr McGlynn

The Department of Climate Change and Energy Efficiency (DCCEE) is currently finalising the design of the Tenancy Lighting Energy Efficiency Assessment tool that forms part of the Commercial Building Disclosure (CBD) program. This submission sets out the Energy Efficiency Council's position in relation to the version of the tool (hereafter referred to as Version 1.0) that was discussed at the CBD Implementation Forum teleconference on 17 May 2011.

We are disappointed about the consultation process in the development of this tool. The Energy Efficiency Council brings together Australia's expertise in energy efficiency to support the development of policy and programs. Incorporating expert advice into the design of energy efficiency programs significantly improves their effectiveness and reduces program risk.

DCCEE committed earlier this year to consult closely with the Council in finalising the tool, but despite repeated attempts we did not receive an updated version of the tool until we received the papers for the CBD Implementation Forum. In our view, DCCEE broke a clear commitment to work with the Council in finalising the tool.

Despite these problems with the consultation process, the Energy Efficiency Council supports the implementation of the CBD Tenancy Lighting Assessment for Offices Rules Version 1.0, subject to minor amendments to the tool and a written commitment to a continuous improvement program that involves ongoing monitoring of lighting assessments, engagement with the property industry and energy efficiency industry, and agreement to modify the tool as necessary.

The Energy Efficiency Council believes that the CBD Tenancy Lighting Assessment for Offices Rules Version 1.0 is effective as a basic examination of the lighting equipment in a tenancy area. The information gleaned through the Lighting Assessment should be sufficient to help prospective buyers and tenants benchmark the efficiency of lighting systems, and this will provide an incentive for building owners to improve lighting efficiency.

The lighting assessment is not a comprehensive lighting audit. Consequently, the Building Energy Efficiency Certificate needs to clearly state that the lighting assessment is not a comprehensive audit. If the lighting assessment indicates that the lighting system is poor quality, the current building owners, prospective buyers or prospective tenants should be encouraged to invest in a detailed audit by a qualified energy efficiency specialist.

The Council also believes that applying Version 1.0 rules will be cost-effective in the majority of situations, and should be cost-comparable with, or cheaper than, a NABERS base-building assessment. However, it will be critical to monitor the tool over time, and modify the rules as necessary. The Council also recommends that the Government establish a fund to support lighting assessments while the system is being refined, in particular offering support over the first two years of the scheme for assessments that are particularly expensive due to the complexity of the site. This would significantly reduce the risk of negative publicity.

The Council strongly recommends the following amendments to the tool:

- It is absolutely critical that the Rules and training associated with the Rules explicitly state that lighting assessors must NOT physically examine light fittings unless they are a qualified electrician or have appropriate training to physically examine light fittings. There are safety risks if inappropriately skilled individuals attempt to physically examine light fittings.
- The Nominal Lighting Power Density (NLPD) categories on page 6 should be changed, so that the 'High' category (poor efficiency) applies to systems with an NLPD greater than $16\text{W}/\text{m}^2$ (rather than $15\text{W}/\text{m}^2$ as currently proposed).

- The names for the NLPD categories and the lighting controls are changed so that they are less confusing. Currently, NLPD categories range from 'Low' (excellent) to 'High' (poor), whereas the lighting control categories vary from 'Low' (poor) to 'High' (excellent). The council recommends that:
 - o NLPD is rated from 'Poor' ($>16\text{W}/\text{m}^2$) to 'Excellent' ($<7\text{W}/\text{m}^2$)
 - o Lighting controls are rated as 'Basic', 'Average' or 'Sophisticated'
- The lighting assessment is meant to address information barriers, and therefore the way that the lighting assessments are presented is critical. The Council recommends the development of a simple 'headline' statement in the Building Energy Efficiency Certificate, which is followed by a more thorough record of the lighting assessment results.
- The lighting assessment should allow space for recording details that may not be relevant to the overall rating, but recognise the effort that building owners have made for energy efficiency improvements in lighting systems (e.g. sensors in meeting rooms).

In conclusion, the Energy Efficiency Council wishes to emphasise our confidence that the Tenancy Lighting Assessment element of the Building Energy Efficiency Certificate will, in time, significantly improve the awareness of tenants in the potential of energy efficient lighting and controls to cut their energy use and carbon emissions.

In recent years many, although by no means all, office building owners have improved the NABERS Energy base building ratings of their assets. However, there is significant evidence that tenants have limited awareness of their energy use and their energy use is increasing. The Lighting Assessment will be a positive step towards improved understanding of energy and carbon issues by this group of energy users.

The Council strongly urges the Government to implement the Tenancy Lighting Assessment as planned from 1 November 2011, and offers our continued support in implementing and refining the tool over time.

Please contact me on 03 8327 8422 should you require further information on any of the issues raised in this submission.

Yours sincerely



Rob Murray-Leach
Chief Executive Officer

Attachment 1

Recommended format for Lighting Assessment Headline

101 Sample Street

Section of building	Lamps and ballast		Lighting controls		Proportion of area rated
	NLPD	Rating	Type	Detail	
Level 1	Good	9 W/m ²	Sophisticated	Zoning, motion sensors & BMS	45 per cent
Levels 2-8	Poor	16 W/m ²	Average	Zoning and manual switches	80 per cent
Level 9	Excellent	6 W/m ²	Sophisticated	Zoning, motion sensors & BMS	70 per cent

Key notes for 101 Sample Street

The building owner submitted a signed statement that they intended to upgrade the lighting systems on levels 2 to 8. Prospective buyers/tenants should examine the proposed lighting system in detail.

Upgrading the efficiency of lighting systems can deliver significant cost savings. One 2,000m² tenancy in Sydney recently saved \$x,000 per annum by moving from an inefficient lighting system to an lighting system with efficient lamps, ballast and lighting controls.

If a lighting assessment indicates there are opportunities to improve lighting efficiency, we recommend a comprehensive lighting audit by an experienced professional. Visit www.eec.org.au for more information.

Illumination levels in the building have not been measured. Illumination levels have an impact on productivity, health and safety. The Australian and New Zealand standard *AS/NZS 1680.2.2.2008* recommends a range of illumination levels including 160 lux for background lighting, 240 lux for screens and 320 lux for general lighting.

Lamp ratings	Excellent	Good	Average	Poor
Control ratings	Good	Average	Basic	