

Lord Mayor Clover Moore
City of Sydney
GPO Box 1591
Sydney, NSW, 2001

Via email: EEMP@cityofsydney.nsw.gov.au

4 May 2015

Re: City of Sydney Energy Efficiency Master Plan Draft

Dear Lord Mayor,

Thank you for the opportunity to comment on the City of Sydney's *Energy Efficiency Master Plan Draft* ('EEMP'). The Energy Efficiency Council ('The Council') is the peak body for energy efficiency in Australia, and brings together our nation's top experts in this area to support the development of policy and programs. This submission sets out the Council's views on the content and recommendations of the draft EEMP.

We congratulate the City of Sydney for recognising energy efficiency as the single largest opportunity for achieving its ambitious *Sydney 2030* greenhouse gas ('GHG') emission reduction target and investing in the significant research, consultation and analysis evidenced in the draft EEMP to set a pathway for real action.

The Council supports the 11 enabling actions set out in the draft EEMP, acknowledging that a multi faceted approach encompassing tool and education, minimum standards, compliance programs, grants, new financing models and ambitious targets is required to safeguard existing energy savings and overcome the barriers to energy efficiency in the built environment.

In particular, the Council is very well positioned to support the City of Sydney in realising the enabling actions targeting the optimising building controls and operations (*Enabling Action 6. Building Tune-Up Program*) and building plant and equipment upgrades (*Enabling Action 7. Building Retrofit Program*).

As the EEMP recognises, energy efficiency literacy in the top tier of the office property market – property institutions with five billion dollars or more in assets – has increased significantly. Members of the City of Sydney's Better Buildings Partnership have reported a 27 per cent energy savings from 2006 levels. However the balance of the commercial office building sector (commonly referred to as the 'mid-tier') is generally not realising these same energy savings and associated benefits. The draft EEMP reports non-premium offices (base buildings) and non-premium offices (tenancies) as the two highest GHG emitting sectors in the City of Sydney. Encouraging this group to exploit straightforward savings is important in Australia's current economic environment.

Tools and information will be critical to executing the building tune-up and building retrofit programs for mid-tier building owners. The Council is currently partnered with the Property Council of Australia ('PCA') in the development of a Building Retrofit Toolkit ('BRT').

Our vision is for the BRT to be a comprehensive package of interventions that includes tools, information and facilitation targeted receptive mid-tier owners and other key 'influencers, providers, and facilitators'. Following two-to-three methodical stages of scoping and development, it will

ultimately provide the information and tools needed to motivate these owners to confidently undertake energy retrofits of their buildings.

This BRT project includes:

- The tools and information necessary for receptive mid-tier owners to undertake building tune-ups and retrofits including standard contract / clauses and a measurement and verification plan
- Broad scale upskilling of market participants by providing supplementary resources for key 'influencers, providers, and facilitators' to engage directly with the receptive mid-tier owners. Likely, the tenants of mid-tier office buildings, property agents, leasing agents, consultants, Councils and others identified as effective change-agents in the course of the project
- A comprehensive engagement effort to familiarise stakeholders with the building upgrade concepts, available tools and supporting information and its concepts

The BRT will enable governments including the City of Sydney, industry bodies and other champions of energy efficiency to utilise a shared set of resources that can underpin consistent, sustained engagement with this difficult to reach sector.

Council also endorses the recognition in draft EEMP that there is a shared responsibility for implementation of the actions. The City of Sydney cannot implement the enabling actions alone, and all levels of government, businesses, residents and other stakeholders must work in partnership with the City of Sydney. The Council welcomes the opportunity for continued engagement over the coming months as the City of Sydney moves to implement the actions underpinning each enabler.

However as the owner and driving force of the draft EEMP, it will be critical that the actions for which the City of Sydney has full control are appropriately financed and that staff appropriately resourced and empowered to drive implementation of the Master Plan. The draft EEMP does not include any details of committed funds from the City of Sydney for implementation. The EEC looks forward to further announcements from the City of Sydney on funding that is commensurate to the ambition of this important program.

Again I offer our congratulations on such a comprehensive and visionary piece of work. If you have any questions, please contact Shauna Coffey, Manager Policy & Advocacy at shauna.coffey@eec.org.au or 0410-227-031.

Yours sincerely



Luke Menzel
Acting CEO