

Mr Simon Wong  
Government Energy Efficiency  
Department of Climate Change and Energy Efficiency  
GPO Box 854  
Canberra ACT 2601

14 October 2010

Dear Mr Wong

The Department of Climate Change and Energy Efficiency requested that the Energy Efficiency Council provide comment on the draft Commonwealth's Green Lease Schedule version 2 (GLS2).

The Energy Efficiency Council welcomes the opportunity to provide input on GLS2. Incorporating advice from energy efficiency experts to the design of energy efficiency programs improves their effectiveness and significantly reduces the risk of program failure.

The Council strongly endorses the intent of GLS2 to improve the energy efficiency and overall sustainability of buildings leased by Australian, State and Territory government agencies. Energy efficiency in government operations is critical to:

- I. Reduce government expenditure
- II. Meet community expectations and existing environmental targets
- III. Create local employment and the capacity to deliver efficiency in the private sector

The Council also supports the intent of GLS2 to ensure a "partnership approach" between and landlords and government tenants to deliver energy efficiency and sustainability improvements. Partnerships between landlords and tenants allows much more comprehensive and cost-effective energy efficiency retrofits, by bundling together measures such as lighting upgrades and Heating, Ventilation and Air Conditioning (HVAC) retrofits.

There are many positive features to the GLS2, including:

- The requirement for the building owner and government tenants to produce and regularly update NABERS base building and tenancy ratings
- The establishment of a Building Management Committee to support cooperation between building managers and tenants
- The inclusion of a dispute resolution mechanism

However, the government should strengthen the requirements on agencies, specifically mandating that agencies to meet their energy efficiency targets within a set timeframe, requiring government tenants to accept a reasonable bandwidth of ambient temperatures and ensuring that fitouts do not impact on lighting levels. Reasonable penalties should be considered to ensure compliance, and while reasonable exemptions do need to be allowed, these should be specified more tightly.

In addition, there are parts of GLS2 where more details would be valuable, including some specification about the content of the Environment Management Plan and ensuring that lighting meets appropriate standards (e.g. AS1680).

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