



27th February 2009

Commercial Building Energy Efficiency Team
Energy Efficiency Branch
Department of the Environment, Water, Heritage and the Arts
GPO Box 87
CANBERRA, ACT 2601
e-mail - commercialbuildings@environment.gov.au

Dear Sir,

Re: AIRAH response to Mandatory Disclosure of Commercial Office Building Energy Efficiency Consultation Regulation Document

Thank you for the opportunity to provide a response on the consultation paper.

AIRAH is a peak body for the air conditioning and refrigeration industry in Australia focusing on the improvement of technical professionalism in our industry. It is from this perspective we provide our response.

AIRAH broadly supports the proposal of Mandatory Disclosure. We believe that a nationally run consistent scheme that raises the awareness of energy use in the built environment is beneficial. Under such a scheme the market has the metrics available to choose which offices / buildings it leases / buys based on environmental performance and it is hoped it will also start to drive improvements in energy efficiency measures and improved operation of buildings.

AIRAH supports the use of NABERS as a performance measurement tool in the mandatory disclosure scheme. This is currently the only tool available in the commercial building sector that measures actual energy performance and is used widely and supported by training.

AIRAH offers to support DEWHA develop relevant training available to those wishing to undertake Energy Efficiency Assessment Reports (EEAR). It is crucial to have a register of competent professionals to undertake this work. The current AIRAH Accredited Energy Auditor scheme makes an ideal basis for this. Further details are at http://www.airah.org.au/ene_aud.asp

We question the rationale behind tenancies being required to undertake NABERS audits. We understand that a tenancy rating is very much based on how the current tenant uses the tenancy and we are not sure how that will relate to possible new tenants.

Once mandatory disclosure is implemented we believe an increased focus on maintenance and re-commissioning for energy efficiency should be considered by the government. This is covered for new buildings under the Building Code of Australia but currently existing buildings are not addressed.

Please feel free to contact us on 03 8623 3000 if you would like to discuss any of these matters.

Yours faithfully,



Phil Wilkinson

AIRAH technical manager

Who is AIRAH?

The Australian Institute of Refrigeration Air Conditioning and Heating (AIRAH) has a long and proud history of representing an industry of professionals who are of fundamental, and increasing, importance to the comfort, health and safety of the community.

Formed in 1920, AIRAH is recognised by government and industry bodies for its expertise across a wide range of issues in the area of engineering services for the built environment.

AIRAH encourages world's best practice within the building industry. As a registered training organisation and through continuing professional development, accreditation programs and a wide range of technical publications, AIRAH has earned a reputation for developing the competence and skills of industry practitioners so that they can better meet society's evolving health, safety and environmental demands.

As the leading specialist membership association for air conditioning, refrigeration, heating and ventilation professionals, AIRAH represents over 10,000 professionals across Australia.

In operation for over 80 years, AIRAH's longevity stems from the successful delivery of key industry benefits including education and training, representation, dissemination of information, networking and member recognition.

AIRAH has worked with a number of local, state and commonwealth government bodies including the Department of Climate Change, Sustainability Victoria, City of Melbourne, City of Sydney, Australian Greenhouse Office and Environment Australia (development of the Refrigerant Selection Guide, a scoping project for best practice programs to support the introduction of commercial refrigeration minimum energy performance), AIRAH has worked on projects in partnership with the Australian Fluorocarbon Council (AFC), Facility Management Association of Australia (FMA Australia), Green Building Council of Australia (GBCA) and the Air Conditioning and Refrigeration Equipment Manufacturers Association (AREMA).