

18/02/09

To whom it may concern,

Given our position in industry as a tier one mechanical contractor, D & E Air Conditioning believe the proposed legislation will have direct and beneficial outcomes for the construction industry at large, and hence welcome it forthwith.

Find below feedback in response to the Consultation Regulation Document regarding Mandatory Disclosure of Commercial Office Building Energy Efficiency.

- How will the lack of industry resources “skill base” be addressed?
- The metering requirements necessary should be better spelt out than at present through the NABERS Energy validation protocol. Adequate metering for base or tenancy ratings is a major hurdle as they must be installed and commissioned 12 months prior to any rating taking place. Perhaps the overheads associated with this crucial initial step could be subsidised.
- The differentiation between tenant and owner responsibilities must be made “black and white”.
- Tax benefits via accelerated depreciation should be offered to early adopters to encourage industry acceptance prior to mandatory disclosure legislation being enforced.
- EPC (Energy Performance Contracting) should be championed by government as an effective remediation tool for owners and tenants who are unsatisfied with their buildings ratings. Investment in efficiency upgrades could be guaranteed or part subsidised by government.
- EEAR should provide a roadmap for clients and provides a vehicle for any proposed EPC with all improvements costed.
- National register is crucial. It should inform participants through the inclusion of case studies, about the most cost effective and reliable improvements that they can make to their buildings and plant types.

James Hattam



ESD Manager