

Mr Carlos Flores
Team Leader – Development and Innovation
NSW Office of Environment and Heritage
PO Box A920
SYDNEY SOUTH NSW 1232

Via email: nabers@environment.nsw.gov.au

8 September 2014

Dear Mr Flores

**RE: FEEDBACK TO NABERS INDOOR ENVIRONMENT RATING TOOL
PUBLIC CONSULTATION**

The Green Building Council of Australia (GBCA) appreciates the opportunity to provide feedback on the NABERS Indoor Environment rating tool (NABERS IE) and welcomes the extension of the consultation period so that industry has ample time to provide detailed and considered feedback.

The GBCA believes that there are a number of positive changes to NABERS IE outlined in the public consultation paper that respond to industry's concerns and feedback over the past several years.

The GBCA welcomes the improvements made to determining the final star rating and score calculation, the inclusion of a new rating report and the enhancements to the technical base of NABERS IE, particularly the clear referencing of Australian Standards as best practice. The new rating score and rating report has addressed a number of industry concerns regarding complexity and lack of uniformity in the way that scores are calculated in NABERS IE.

The GBCA's primary feedback on suggested improvements to the tool relates to the way in which the rating is achieved and its subsequent impact. A NABERS IE rating is achieved by engaging a consultant (or several consultants) to measure and verify a building's indoor environment performance. A NABERS IE rating will provide the building owner and tenant/s a snapshot of the building's performance, as well as highlighting any areas that may require remedial action or further investment.

While the expertise of the consultants, coupled with the enhancements to NABERS IE, provides a more robust rating tool than before, a process led by external consultants may miss opportunities to create a culture of continuous improvement. A process that does not fully engage with the building/facility manager in order to achieve the rating, may provide little incentive for facility managers to improve their capacity or skills or improve internal building management, operation or maintenance processes.

The GBCA urges the NABERS team to consider how NABERS IE can encourage greater input and collaboration from building/facility managers to achieve even better outcomes for buildings and occupants.

As you are aware, the GBCA expressed an interest in providing a representative from the organisation to participate on the NABERS IE Technical Working Group. While it is understood that participants on the TWG were chosen primarily for their highly technical expertise in the area of indoor environment quality, we believe that the review and revision of NABERS IE could have been well-served by the inclusion of a GBCA representative with expertise in the area of rating tool development as well as experience in the development of metrics and benchmarks for measuring aspects of indoor environment quality.

Once again, the GBCA welcomes the opportunity to work with the NABERS team to detail the process we undertook to develop our rating tool, and work jointly to understand the areas of commonality to improve the way in which NABERS and Green Star work together. Complementary, industry-accepted rating tools will assist more buildings to become healthy and productive as well as more resource efficient and cost effective to run.

Thank you once again for the opportunity to provide feedback. Please do not hesitate to contact the GBCA should you require any further information or clarification.

Yours sincerely

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