

25 August 2011

Director
GEMS Legislation Taskforce
Renewables and Energy Efficiency Division
Department of Climate Change and Energy Efficiency
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Dear Director,

**RE: CONSULTATION ON THE DRAFT GREENHOUSE AND
ENERGY MINIMUM STANDARDS BILL**

Thank you for the opportunity to provide a submission regarding the draft Greenhouse and Energy Minimum Standards (GEMS) Bill. The Green Building Council of Australia (GBCA) supports the National Strategy on Energy Efficiency and supports, in principle, measures that are developed as part of its implementation. While the GBCA does not have any formal comments on the questions outlined in the discussion paper, the GEMS legislation will relate to aspects of the Green Star rating tools and we welcome the chance to provide comment.

The GBCA supports the aim of the GEMS scheme to regulate the energy efficiency and greenhouse gas impact of various household and commercial products. Industry and the wider community are increasingly embracing design, technologies and products that deliver greater energy efficiency. GEMS will assist people in making more informed decisions about the appliances and equipment they will use in their homes and buildings.

The GBCA is Australia's leading authority on green building, established in 2002 to develop a sustainable property industry in Australia and drive the adoption of green building practices. The GBCA promotes green building programs, technologies, design practices and processes, and operates Australia's only national voluntary comprehensive environmental rating system for buildings - Green Star.

The GBCA has more than 930 member organisations, including government departments, which work together to support the Council and its activities. The GBCA is also a founding member of the World Green Building Council, which was established to provide a federated 'union' of national green building councils with a common goal to support the sustainable transformation of the global property industry; there are now 86 such councils worldwide.

Green Star

Green Star is a voluntary tool that recognises, rewards and encourages best practice and innovation. The first Green Star rating tool was released in 2003 in response to market demand for a rating tool that would evaluate the environmental design and construction of buildings as well as establishing a common language for green buildings.

There are currently nine Green Star rating tools which address a range of building types. The GEMS legislation will affect aspects of the Office, Office Interiors, Industrial, and the Multi Unit Residential tools in particular (please note that there is no Green Star rating tool for single dwellings).

Green Star is designed to take an holistic approach within each rating tool and across the suite of Green Star rating systems. A significant step in the evolution of Green Star is the development of the Green Star – Performance tool. This tool is due to be released next year and will be designed to assess the operational performance of existing buildings. Green Star – Performance will address the gap between ‘Design’ and ‘As Built’ certifications, by assessing the operational impacts in the built environment that follow the design and construction of buildings.

Green Star is also looking beyond individual buildings to precincts and communities. In 2009, the GBCA commenced work, in consultation with government and industry, on the development of a rating tool for sustainable development projects on a community scale. The first step in developing the Green Star Communities rating tool was to develop a national framework consisting of five best practice principles. We are now working on Stage 2 of the project which involves establishing best practice benchmarks for assessing and certifying sustainable communities.

Green Star rating tools cover nine categories and projects must attain credits in each category to be able to achieve a Green Star certification. The credits in the Energy category target reduction of greenhouse emissions from building operation by addressing energy demand reduction, use efficiency, and generation from alternative sources. The proposed GEMS legislation will affect the labelling requirements for products that may be selected to meet the criteria for several specific credits, including energy sub-metering, energy efficient appliances (Multi Unit Residential tool only) and lighting.

The ‘Energy-Efficient Appliances’ credit, for example, within the Multi Unit Residential Tool, has the aim of encouraging and recognising the installation of energy-efficient appliances as part of the base building works. The credit criteria stipulate that up to two points are awarded where energy-efficient appliances are installed as part of the base building works as follows:

- One point is awarded where it is demonstrated that:
 - All clothes dryers and dishwashers have the highest available rating under the Australian Government's "Energy Rating" labelling system; or
 - All clothes dryers, dishwashers, refrigerators and clothes washers are at or within one point of the highest available rating under the Australian Government's "Energy Rating" labelling system; and
 - Internal or external clothes lines and/or hoists are provided that have a total line length of not less than 7.5m per dwelling.

- Two points are awarded where it is demonstrated that:
 - All clothes dryers, dishwashers, refrigerators, and clothes washers have the highest available rating under the Australian Government's "Energy Rating" labelling system; and
 - Internal or external clothes lines and/or hoists are provided that have a total line length of not less than 7.5m per dwelling.
- A dwelling design that provides neither space nor plumbing for the installation of dishwashers will be deemed to be equivalent to installing a dishwasher of the highest available Energy Rating.
- A dwelling design that provides no private laundry facility will be deemed to be equivalent to installing a clothes dryer of the highest available Energy Rating.

In this way, the Green Star rating tools try to encourage and reward best practice outcomes within the design and construction of developments through the use of credits which relate to the specific environmental impacts and their origins.

Supporting greater energy efficiency

The built environment offers significant opportunities to reduce carbon emissions. While buildings are responsible for almost a quarter of Australia's total greenhouse gas emissions, the building sector also has the greatest potential to deliver emissions cuts, at the least cost, using technology available now.

The GBCA supports the provision of contemporary regulations that require more sustainable building practices. We believe it is important that minimum standards are regularly reviewed and updated to reduce the environmental impact of the built environment. Regulations must also be evaluated to ensure that they will not hinder industry advances. To achieve the best outcomes, contemporary regulation must also be complemented by incentives and support for voluntary measures so that industry will look beyond simply meeting minimum requirements to aiming for best practice and setting new benchmarks.

Looking beyond energy efficiency

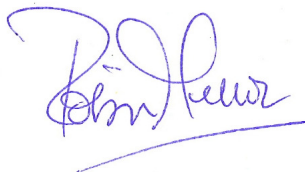
While the GBCA supports the strong government focus on energy efficiency and commends initiatives such as the Prime Minister's Task Group on Energy Efficiency, the National Strategy on Energy Efficiency, the Commercial Building Disclosure scheme and the Tax Breaks for Green Buildings program, we believe it is important that the focus is broadened to include other key environmental impacts. It is vital that the interrelation of green building attributes such as indoor environment quality, management, waste and energy are examined, or we will miss opportunities to further reduce greenhouse gas emissions and to create healthier buildings in which people can live, work, learn and play.

Thank you once again for the opportunity to provide comment on this matter. We look forward to working with the Australian Government to help transition Australia to a low carbon future.

Yours sincerely,



Romilly Madew
Chief Executive



Robin Mellon
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