Brisbane City Council Submission on
National Framework for Energy Efficiency Stage Two Consultation Paper

COMMENTS

Continuing Measures

(5) Mandatory disclosure of building energy performance

We have two main concerns with regards to the national rollout of mandatory disclosure of building energy performance on sale:

- That the efficiency of permanent fixtures and fittings be included to give a full picture of building energy efficiency, particularly hot water systems, associated plumbing fittings, fixed appliances and lighting; and,

- That energy-efficiency ratings reflect the building performance with regards to typical patterns of appliance use (particularly air-conditioning units) in Brisbane's subtropical climate.

New Measures

(1) Strengthened and expanded MEPS

We support strengthened and enhanced MEPS. However, we are concerned about its monitoring and enforcement. Enhanced MEPS cannot be effective without a rigorous compliance system.

(2) Incandescent lighting phase-out strategy

We have two main concerns regarding the incandescent lighting phase-out. The first regards the quality of replacement compact-fluorescent lights (CFLs). Most CFLs currently available have a low power factor (typically around 0.5). Such low power factors increase losses in the power distribution system, meaning that energy is wasted and extra greenhouse emissions generated.

CFLs with higher power factors are available. Minimum power factor standards should be established. This must ideally precede, or at least occur in conjunction with, the phase-out of incandescent lighting, because low power factor CFLs installed today will remain in the housing stock for several years, unnecessarily wasting energy and generating greenhouse emissions.

Secondly, we support the provision of information about the safe and environmentally-sound disposal of CFL lights at the end of their lifespan. We would like to see possibilities explored for regulating light producers and distributors to take responsibility for the safe disposal of CFLs (such as extended producer responsibility schemes).

(3) Government leadership through green leases

We support Commonwealth Government leadership in generating demand for green building leases. Brisbane City Council has had considerable success in generating demand for energy efficiency in commercial buildings in Brisbane through our own requirement for office space with five-star Green Building Council of Australia office space.

In relation to the second part of the measure, we note the proposal to develop additional tools to assist facility managers and tenants to meet green lease requirements. We suggest promotion and capacity building activities are extended to other types of tenancies, such as shopping centres and educational facilities (as now being pioneered by Green Building Council of Australia rating tools).

(4) HVAC high efficiency systems strategy

We support the HVAC high efficiency systems strategy. We suggest the following issues and options are addressed:

- Residential and non- residential systems be given equal consideration in the strategy. In Brisbane, 80% of new dwellings built until 2012 will be multi-unit dwellings that, due to their location and/or design may be highly reliant on active HVAC systems. For this reason, residential HVAC systems are of central concern in cities like Brisbane that are rapidly consolidating.

- Alternative and passive ventilation systems are considered and accommodated in the strategy (e.g. ventilation systems powered by renewable energy sources, such as wind, or integrated into building design or retrofit).

- That the operation of HVAC systems in relation to occupant comfort is considered and further researched as part of the efficiency strategy. That is, thermostat settings are reconsidered in relation to occupant comfort, and possibilities for changed HVAC operation considered.

(5) National water heater strategy

The national water heater strategy is inadequate and we have major concerns about its ability to achieve its stated objectives. Specifically:

- The strategy correctly identifies the unnecessary contribution of domestic water heating to national greenhouse emissions. Greenhouse friendly alternatives to storage resistive hot water systems are available and are cost-effective. On this basis, the strategy should regulate to ban the installation of electric storage hot water systems at the national level.

- Such regulation would make the installation of more greenhouse-friendly systems compulsory. Energy efficiency improvement efforts should then focus on improving these heaters.

- The strategy should strongly support the installation of solar hot water systems over gas or alternative electric systems where possible. We envisage that solar energy will form a high proportion of a long-term, sustainable energy mix. Supporting the installation of solar or heat pump hot water systems rather than gas where possible would encourage this.