



12 December 2011

Energy Savings Scheme Rule Change Consultation  
Department of Trade and Investment  
GPO Box 3889  
Sydney, NSW, 2001

By email: [ess@dwe.nsw.gov.au](mailto:ess@dwe.nsw.gov.au)

Dear Sir or Madam,

### **Energy Savings Scheme Rule Change Consultation**

Thank you for the opportunity to comment on the proposed changes to the Energy Savings Scheme (ESS). The Property Council of Australia has been a strong advocate for effective mechanisms to improve energy efficiency in the property sector in NSW.

Improved energy efficiency brings significant benefits for our members and the wider community, including:

- Effective greenhouse gas abatement to address climate change;
- Improved productivity of state and private infrastructure; and
- Improved financial performance of property investments.

Our members consider the ESS has been well designed and implemented to achieve these aims effectively and efficiently. The proposed rule changes are a positive step to further improve the scheme. We fully support all the proposed changes and in this submission we also propose expanding the scope of some of the changes to maximise the potential positive impacts of the scheme.

The second issue in the consultation paper proposes the inclusion of hotels and motels under the Commercial Lighting Energy Savings Formula. The Property Council supports this proposal but we strongly suggest that this change be expanded to include *all* types of properties that come under Class 3 of the Building Codes of Australia (BCA).

BCA Class 3 covers an important sector of the NSW property market, of which hotels and motels are just one part. The other types of premises under Class 3 represent significant opportunity for energy efficiency improvements. The other types of properties listed under Class 3 of the BCA include boarding houses, guest houses, hostels, accommodation for the aged and residential parts of detention centres.

## The *Voice* of Leadership

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These other property types typically deliver a range of additional social and financial benefits to the community. Improving the energy efficiency of these types of properties will help improve the operational efficiency of the organisations, and therefore increase the financial and social benefits they provide to the community. Good examples of these are residential areas of aged care facilities, health care facilities and detention centres.

Expanding the scheme to these property types would increase the potential energy savings opportunities implemented, and also ensure that important parts of the sector are not excluded from the benefits of the scheme.

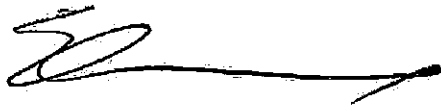
#### **About us**

The Property Council of Australia is the nation's peak representative of the property industry. Our 2,200 members are Australia's major investors, developers and owners of office, residential, retail, industrial, retirement living and hotel assets worth over \$320 billion. The property sector is the single largest employer in NSW, contributing over ten per cent of Gross State Product and paying more tax than any other industry.

I would be pleased to discuss this submission further. Please do not hesitate to contact me on

Thank you for considering this submission.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Edward Palmisano', with a long horizontal stroke extending to the right.

Edward Palmisano

**NSW Deputy Executive Director**