

21 February 2014

Emissions Reduction Fund submissions
Department of the Environment
GPO Box 787
CANBERRA ACT 2601

To whom it may concern,

Emissions Reduction Fund Green Paper

The Australian Sustainable Built Environment Council welcomes the opportunity to comment on the Emissions Reduction Fund (ERF) Green Paper.

The Australian Sustainable Built Environment Council (ASBEC) is the peak body of key organisations committed to a sustainable built environment in Australia. ASBEC's membership consists of industry and professional associations, non-government organisations and government observers who are involved in the planning, design, delivery and operation of our built environment, and are concerned with the social, economic and environmental impacts of this sector.

The built environment has significant potential to deliver abatement, primarily through energy efficiency upgrades. If designed well, the ERF will provide a significant incentive for industry participants to take up abatement opportunities within their facilities.

To assist ASBEC's contribution to the Government's consultation process, a Direct Action workgroup was formed and the Property Council of Australia commissioned a report from ACIL Allen Consulting about the design and rules governing the ERF. This was submitted to the ERF Terms of Reference consultation process and subsequently endorsed by the full ASBEC Council at its meeting in November 2013.

The enclosed submission draws heavily on the ACIL Allen Report and we encourage the Government to consider the content of that report closely when developing the detail of the White Paper and draft legislation.

This submission to the ERF Green paper is endorsed by the following members of ASBEC's Direct Action Workgroup:

- Property Council of Australia
- Australian Institute of Architects
- Green Building Council of Australia
- Australian Institute of Quantity Surveyors
- Infrastructure Sustainability Council of Australia
- Good Environmental Choice Australia
- Insulation Australasia
- Chartered Institute of Building
- Australian Institute of Refrigeration Airconditioning and Heating
- Royal Institution of Chartered Surveyors
- Facilities Management Association of Australia



Given the tight timeframe for consultation, the attached response to the Green Paper will be tabled for discussion at the next ASBEC meeting to be held on 17 March 2014. If ASBEC has further views to contribute at that time we will contact the Department directly.

We look forward to contributing to the Government's further consultation process about the ERF. Please do not hesitate to contact me if you have any queries about this submission.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'D Parken', with a long horizontal flourish extending to the right.

David Parken, LFRAIA
CEO, Australian Institute of Architects
Chair, ASBEC Direct Action Workgroup

Enc. *Submission to the Department of the Environment responding to the ERF Green Paper, ASBEC 2014*