

5th March 2004



**Western Australian Sustainable
Energy Association (WA SEA)**

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Energy Efficiency Regulation Document (RD2003/01)
Australian Building Codes Board
GPO Box 9839
CANBERRA ACT 2601

RE: Energy Efficiency Measures : Regulatory Proposal for Class 2, 3 & 4 Buildings

The Western Australian Sustainable Energy Association (WA SEA) Inc. welcomes the opportunity to comment on the Australian Building Codes Board's **Energy Efficiency Measures : Regulatory Proposal for Class 2, 3 & 4 Buildings**.

WA SEA Inc. is the peak body of the Western Australian sustainable energy industry. The Association promotes the development and adoption of sustainable energy technologies and practices that minimise and/or displace fossil fuel use. The Association has over 60 individual and company members representing a broad spectrum of the sustainable energy industry.

In general, WA SEA is supportive of the proposed measures and sees their implementation as a positive step towards better energy management within commercial buildings.

The following outlines minor amendments required:

Further clarification of terminology is required. Section J1.4 Roof Lights refers to 'roof lights serving a room or interconnecting space...' whereas 3.12.1.3(a) Amendment 12 refers to 'roof lights serving a *habitable* room or an interconnecting space...'

Table J1.4 should be completely revised and differentiate between **Shafted** and **Nonshafted** skylights.

In addition, WA SEA believes the ABCB should adopt a similar measure as implemented in Victoria where a 4-star rated building can achieve a 5-star rating if a solar hot water system is installed.

Thank you once again for the opportunity to comment. If you have any further questions, please do not hesitate to contact Johanna Gastevich on (08) 9328 8411.

Your Sincerely

Johanna Gastevich
Executive Officer

Western Australian Sustainable Energy Association (WA SEA) Inc.

Mission:

'On behalf of the people of Western Australia, the Association will vigorously promote the development and adoption of sustainable energy so that by the end of this decade, 30% of the states fossil fuel use is displaced by sustainable energy practices.'