



3rd August 2009

Ivan Donaldson
Australian Building Codes Board
GPO Box 9839
CANBERRA, ACT 2601

Via email: BCA2010@innovation.gov.au

Dear Ivan,

Re: AIRAH response to ABCBs proposal for BCA 2010 Volume one – energy efficiency measures.

Thank you for the invitation to comment on the proposed measures for the Building Code of Australia (BCA) 2010 Volume 1.

The Australian Institute of Refrigeration Air Conditioning and Heating (AIRAH) strongly support the proposed improvements to the energy efficiency requirements in the BCA.

We are particularly strong advocates of the importance of the correct commissioning of building service systems and the development of maintenance requirements during the design and construction phase of a project. We would like to focus our input on these two critical, yet to date oft overlooked areas:

Commissioning

AIRAH fully supports the introduction of further requirements for commissioning, operating manuals, and the formal monitoring of energy use in buildings. In tandem with training aimed at property and facility managers, this will further enhance the energy efficiency of buildings.

Accurate commissioning is essential in ensuring that the design intent of a building is met during the building's actual operation. Commissioning should be undertaken using a whole-systems approach, ensuring that all facets of the building work together towards maximum operating efficiency as initially anticipated and designed. This has the potential to save enormous amounts of energy and water, also preventing environmentally damaging amounts of greenhouse gases from being released throughout the life of the building.

We consider the fine tuning and / or seasonal commissioning of buildings to be an important step in the first 12-18 months of operation in improving system performance.

Initially, work is required to define the terms used in commissioning and the requirements covered in the BCA. AIRAH is keen to assist with industry consultation in achieving this goal in BCA 2010. As an Institute, we are committed to developing an Australian commissioning code that will be an ideal framework for the proposed measures. We welcome ABCB's input on this.

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Maintenance

Evidence suggests that effective maintenance leads to greater energy efficiency. Appropriately maintained plant and equipment consume less energy, are better environmentally, safer to operate, more economical to run and more likely to satisfy building occupants.

AIRAH proposes that BCA part J8 be expanded to include aspects that facilitate the ongoing operation of the plant, these include maintenance manuals and monitoring methodology.

It is encouraging that the BCA is looking at the proposal to include commissioning and maintenance of buildings.

Please feel free to contact me on 03 8623 3000 if you would like to discuss any of these matters.

Yours faithfully,

Phil Wilkinson

AIRAH technical manager

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Who is AIRAH?

The Australian Institute of Refrigeration Air Conditioning and Heating (AIRAH) has a long and proud history of representing an industry of professionals who are of fundamental, and increasing, importance to the comfort, health and safety of the community.

Formed in 1920, AIRAH is recognised by government and industry bodies for its expertise across a wide range of issues in the area of engineering services for the built environment.

AIRAH encourages world's best practice within the building industry. As a registered training organisation and through continuing professional development, accreditation programs and a wide range of technical publications, AIRAH has earned a reputation for developing the competence and skills of industry practitioners so that they can better meet society's evolving health, safety and environmental demands.

As the leading specialist membership association for air conditioning, refrigeration, heating and ventilation professionals, AIRAH represents over 10,000 professionals across Australia.

In operation for over 80 years, AIRAH's longevity stems from the successful delivery of key industry benefits including education and training, representation, dissemination of information, networking and member recognition.

AIRAH has worked with a number of government bodies including the Australian Greenhouse Office and Environment Australia (development of the Refrigerant Selection Guide, a scoping project for best practice programs to support the introduction of commercial refrigeration minimum energy performance), AIRAH has also recently completed projects for Brisbane City Council (development of guidelines for residential air conditioning systems) and worked on projects in partnership with the Australian Fluorocarbon Council (AFC) and the Air Conditioning and Refrigeration Equipment Manufacturers Association (AREMA).