

Ruling: Managing impacts of COVID-19 on NABERSNZ ratings v2.0

Version: 1.0 – Issued on 31st March 2020

Version: 2.0 – Issued on 23rd June 2020

0. Summary of changes

Following communication with Assessors and the latest guidance issued by NABERS Australia, NABERSNZ has decided to take a 'business as usual' approach to the treatment of data collected during the COVID-19 affected period and will focus on providing additional clarification and guidance to help Assessors to deal with any unusual situations that have arisen during and post the COVID-19 lockdown.

In version 2.0 of the Rulings, clarifications have been added including the use of another Assessor, the rating submission period, methods of collecting data for rating periods that cover the COVID-19 affected period, etc.

Note: significant changes/updates have been underlined for attention.

1. Introduction

This document was originally developed by NABERS Australia and adapted to New Zealand by NZGBC to provide clarifications and guidance to Assessors, and present time-bound Rulings regarding the potential impacts of COVID-19 on the NABERSNZ ratings.

This document is released for use immediately and will be valid until 31st July 2020 and supersedes the previous version 1.0.

The NABERSNZ team will continue to monitor the changing circumstances and may extend the validity of the Rulings as well as further inclusions and/or exclusions as the situation unfolds.

If Assessors wish to use the Rulings outlined in this document, they must obtain prior written approval from NABERSNZ. In addition, Assessors must download a copy of this document and keep it with their rating documentation. All evidence used when implementing the Rulings should be kept for future audit.

It is the Assessors' responsibility to ensure the latest version of Rulings are being used. If the Assessor is uncertain of the correct version of Rulings to use, please contact NABERSNZ in advance.

If Assessors have any feedback on this document or any further questions, please contact us at nabersnz@nzgbc.org.nz.

2. Clarifications

2.1 Does NABERSNZ require the same evidence if the building is impacted by COVID-19?

Aside from the exceptions listed in the Rulings below, the same evidence requirements remain in place for NABERSNZ ratings. The Assessors are responsible for the accuracy of their ratings and must collect and retain the required documentation as per the NABERSNZ Rules and provide this for audit if required.

2.2 What if an Assessor can't conduct a site visit on time due to travel restrictions, illness or quarantine?

NABERSNZ will allow site visits to be conducted by another Assessor if the rating Assessor is not available.

The Assessors should have prior approval from NABERSNZ via email. All requirements regarding site visits remain the same as per the NABERSNZ rules. The Assessor who registered the rating application will take the responsibility of the accuracy of data collected.

2.3 What if the rating missed the 4-month submission deadline due to travel and/or access restrictions?

With regards to delayed site visits, NABERSNZ will allow ratings with site visits outside the rating period, the Assessors should have prior approval from NABERSNZ via email.

If the rating will miss the 4-month post end of rating period submission deadline, the Assessors should refer to the COVID-19 Rulings for further guidance, or Assessors could shift the rating period to when it's possible to conduct site visits.

Ratings can now get up to 2-months extension to the submission deadline (6-months allowance instead of 4-months). Assessors need to demonstrate the delayed submission is directly impacted by COVID-19. The application will be reviewed on a case-by-case basis by NABERSNZ.

2.4 How will NABERSNZ treat a period of building shutdown for ratings?

The NABERSNZ Rules include provisions that can capture short-term low-occupancy or shutdown situations during the rating period, e.g. the period between **26th March 2020 (start of Alert Level 4) to 13th May 2020 (end of Alert Level 3)**.

If the premises being rated have been heavily vacated in the event of longer-term low occupancy following lockdown (e.g. continuous low occupancy during and/or after Alert Level 2, starting from **14th May 2020**), please refer to the Rulings provided in Section 3 of this document.

NABERSNZ will continue reviewing the impact of the low occupancy on rating results as the situation progresses, further clarifications and/or guidance will be provided if need.

The sections below provide further guidance to determine if any functional space is 'ready for occupation' and 'actively used by tenants' for Base Building, Whole Building and Tenancy ratings as per the NABERSNZ Rules.

2.4.1 Base Building Ratings

For Base Building ratings, the crucial test is whether any functional space is 'ready for occupation' as defined in *Section 3.2 of the NABERSNZ Energy and Water for Offices – Rules v1.1*:

A space within the Rentable Area of a building is ready for occupation when a person or organization is entitled to exclusive use of the space (for example, through ownership or a lease or other agreement), and requires normal base building services to keep the space comfortable for office work, such as access, air conditioning, lighting and power to be provided to the space.

Depending on the exact circumstances, a building or premise may be considered as either 'ready for occupation' or not 'ready for occupation'.

- **Ready for occupation**

If it is considered 'ready for occupation', e.g. normal base building services are required, occupation days would be entered as normal, regardless of whether the building was tenanted or not.

- **Not ready for occupation**

If a shutdown period is interpreted as not 'ready for occupation' then the building would be considered vacant and occupation days would be marked as '0' for the period, which will help adjust the total weighted Rated Area for the rating.

- **Energy inclusion/exclusion**

Under either circumstance, any energy use of the space would still need to be included as per *Section 6.2.1 of NABERSNZ Energy and Water for Offices – Rules v1.1*.

Based on the feedback received from Assessors, it is understood that most periods of the NZ COVID-19 Alert Level 3 and Alert Level 4 (between 26th March 2020 to 13th May 2020) would be considered as **NOT** 'ready for occupation'. Assessors are required to provide evidence to demonstrate normal base building services were required and the office spaces are 'ready for occupation' during this period.

Where it is approved by NABERSNZ that the premises were 'ready for occupation', it is recognized that that premises owners and managers will look to reduce energy and water consumption while occupancy is at lower than expected levels due to COVID-19. Such actions include adjustment of BMS schedules, switching to 'on request' servicing and shutdown of floors known to be unoccupied. NABERSNZ is supportive of these actions, and as an overarching principle during these unusual times, NABERSNZ believes that buildings should be run in the most energy efficient way possible, as long as it is safe to do so.

2.4.2 Whole Building/Tenancy Ratings

The crucial test of Whole Building and Tenancy rating is whether the premises are 'actively used by tenants' as office space, including use as an office support facility, as defined in *Section 3.2 of NABERSNZ Energy and Water for Offices – Rules v1.1*.

Depending on the exact circumstance, the period between **26th March 2020 (start of Alert Level 4) to 13th May 2020 (end of Alert Level 3)** is likely be considered as **NOT** 'actively used by tenants', and the occupation days should be entered as '0' for the period, which will help adjust total weighted Rated Area for the rating. It is understood that most office spaces were reoccupied following the move into Alert Level 2 and 'actively used by tenants' again.

3. Rulings – Managing impacts of COVID-19 for NABERSNZ ratings v2.0

3.1 Exemptions to requirements in this Ruling

NABERSNZ is able to provide exemption(s) for any part of this Ruling on a case-by-case basis when requested prior to the submission of a rating application. Exemptions may be granted for situations such as:

- Where the energy consumption or the normal base building services level of the premises has not significantly changed (for Base Building ratings); or
- Where occupancy levels are normal or with minor changes and will not impact the final rating outcome (for Whole Building and Tenancy ratings); or
- Where only a small part of the rating period is within the COVID-19 affected period (26th March 2020 to 31st July 2020).

If the Assessor is uncertain about whether the exemptions apply to the premises or not, please contact NABERSNZ in advance.

3.2 Managing impacts of COVID-19 on site visits for NABERSNZ ratings

3.2.1 Eligibility requirements

The Rulings are intended to provide additional flexibility around the NABERSNZ Rules for Assessors where a site visit was proposed for the period between **26th March 2020 and 31st July 2020**, and the site visit can't be conducted because:

- Another Assessor is not available; or
- The Assessor is not able to access the site because the risk of a site visit has been deemed to be too high by an Assessor or Assessor's organisation; or
- The building is in lock-down, and access to the building has been limited; or
- The proposed site visit can't be conducted due to travel restrictions.

Note: Evidence proving the proposed site visit date must be approved by NABERSNZ and could include:

- *Calendar invites (time-stamped), including their recipients; or*
- *Email correspondence with the building owner and/or building manager, etc.; or*
- *Travel and accommodation bookings; or*
- *Comparison of timings with other similar ratings, showing that the site visit would typically occur at that point in the rated period; or*
- *Written confirmation from the building owner and/or building manager that a site visit is due to happen within the period of lockdown, along with other rating information demonstrating that the rating is ready to progress.*

Ratings cannot apply this Ruling without demonstrating site visits have been impacted by COVID-19 directly, e.g. site visits that are scheduled during Alert level 1 or prior Alert Level 4 lockdown.

3.2.2 Compliance options of Rulings

The options have been listed **in order of priority** and a combination of the options below is acceptable, however the Assessor should seek approval from NABERSNZ in advance.

3.2.2.1 Use of a prior site visit

For the period in which this Ruling is valid, NABERSNZ will allow ratings to be lodged using evidence from a prior site visit in the following circumstances:

- The Assessor undertook the prior site visit themselves or is able to obtain a detailed briefing with notes and photos from a previous Assessor; and
- The prior site visit related to the most recent rating and was within the last 3 years; and
- The Assessor is able to source confirmation of building usage data (such as operation/occupancy hours and computer counts) as well as any other changes that have occurred that might impact the rating; and
- The Assessor has enough compliant information to conduct the rating according to the Rules.

If any of the conditions listed above can't be met, a prior site visit cannot be used.

3.2.2.2 Use of non-Assessor information from a site visit

Where the 'Use of a prior site visit' not applicable, for the period in which this Ruling is valid, NABERSNZ will allow ratings to be lodged using evidence from a non-Assessor site visit in the following circumstances:

- Evidence has been collected to demonstrate that the non-Assessor used is familiar with the operation of the building (building or facilities managers are preferred non-Assessors); and
- A proposed strategy to conduct the site visit and confirmation of the information gathered from the non-Assessor; and
- The Assessor has enough compliant information to conduct the rating according to the Rules.

If any of the conditions listed above can't be met, information from a non-Assessor can't be used.

Note: NABERSNZ strongly encourages the use of virtual technology to conduct a site visit through a non-Assessor (for example, a video-call walk through with a facilities manager). The video can be retained for level 2 audits.

3.3 Managing impacts of COVID-19 on rated hours and computer counts for NABERSNZ ratings

3.3.1 Operations hours for Base building ratings

For the period during which this Ruling is valid, Core Hours from prior to the COVID-19 affected period should be applied to the whole rating period. Assessors should follow NABERSNZ Rules to calculate Core Hours for the Base Building ratings.

The adjusted Occupation Period will reflect the impact of office spaces being vacant and NOT 'ready for occupation', no further adjustment is required for data input.

During the COVID-19 affected period, AHAC hours should continue to be specific to those days that AHAC was requested by tenants.

3.3.2 Occupancy hours for Whole Building/Tenancy ratings

3.2.2.1 NABERSNZ rating period outside the COVID-19 affected period

- **Occupancy Hours**

Where the Tenancy Occupancy Surveys are unable to be undertaken and the Ruling 3.2 *Managing impacts of COVID-19 on site visits for NABERSNZ ratings* is not applicable, the occupancy hours for Whole Building and Tenancy ratings should be the same as Base Building hours or 48 hours (conservative values based on NABERSNZ certification database), whichever is smaller.

- **Computer numbers**

Where *the 3.2 Managing impacts of COVID-19 on site visits for NABERSNZ ratings* is not applicable, the computer numbers should be calculated with the assumption that 20m² per computer (conservative values based on NABERSNZ certification database).

3.2.2.2 NABERSNZ rating period covers the COVID-19 affected period

- **Occupancy Hours**

Where the NABERSNZ rating period covers the COVID-19 affected period, and evidence is available that occupancy pattern of office spaces is similar to the prior COVID-19 affected period, the hours collected from Tenancy Occupancy Surveys should be applied to the whole rating period.

The adjusted Occupation Period will reflect the impact of office spaces being vacant and **NOT** 'actively used by tenants', no further adjustment is required for data input.

Where tenant office spaces are experiencing long term low occupancy which has impacted the accuracy of Tenancy Occupancy Surveys (failing to meet the required minimum 20% occupancy threshold), the occupancy hours for Whole Building and Tenancy ratings should be the same as Base Building hours or 48 hours (conservative values based on NABERSNZ certification database), whichever is smaller.

- **Computer numbers**

Where the NABERSNZ rating period covers the COVID-19 affected period, and evidence is available that occupancy pattern of office spaces is similar to the prior COVID-19 affected period, the computer numbers should be applied to the whole rating period.

Where tenant office spaces are experiencing long term low occupancy which has impacted the ability of computer counts, the computer numbers should be calculated with the assumption that 20m² per computer (conservative values based on NABERSNZ certification database).

- **Alternative values**

Where there is an unreasonable impact on the star rating using conservative inputs, alternative values can be used at the discretion of NABERSNZ and will depend on the robustness of the alternative values proposed by the Assessor.