



23 April 2019

The Hon. Karen Andrews MP
Minister for Industry, Science and Technology
PO Box 6022
House of Representatives
Parliament House
Canberra ACT 2600

By email: karen.andrews.mp@aph.gov.au

Dear Minister

A consumer voice in the National Construction Code 2022 development process

In recognition of the substantial benefits more efficient homes can have on cost of living, health and wellbeing (especially for low-income and disadvantaged households) and emissions reduction, more than 60 community organisations came together ahead of the December 2018 COAG Energy Council meeting to urge action to improve the energy performance of all Australian homes.¹

We therefore welcome the recent decision by the Building Ministers Forum to support the COAG Energy Council's commitment to a 'Trajectory for Low Energy Buildings', and to request the Australian Building Codes Board (ABCB) to provide further advice on a holistic review of the energy efficiency provisions in the National Construction Code (NCC).

However, we are concerned that the interests of Australians whose energy bills, health and well-being and right to a safe climate are directly affected by the energy performance of their home, are not adequately represented through current NCC consultation processes.

As the ABCB embarks on consultation for the 2022 update of the NCC, we urge the Building Ministers Forum to work with the ABCB to consider opportunities for improving the accessibility of current processes to a broader range of community and environmental perspectives.

Based on our experience in a range of government, industry and community sector stakeholder engagement processes, specific initiatives that could be considered include:

- Consumer representation on technical advisory committees;
- Establishment of an additional advisory committee made up of consumer representatives;

- Proactive consultation opportunities to canvas a wider range of less technical perspectives, such as stakeholder workshops in key jurisdictions. Consultation processes conducted by the DE&E Trajectory for Low Energy Buildings project and the ABCB Accessible Housing Project during 2018 provide useful precedents;
- Ensuring stakeholder engagement is representative and meaningful by:
 - Identifying key stakeholders early in the process and ensuring communications provide sufficient lead-time for meaningful response and engagement;
 - Ensuring documentation is accessible in terms of both volume, timing and language;
 - Clearly articulating the boundaries of the decision-making process and scope of issues on which views are being sought;
 - Ensuring expectations for engagement are feasible for stakeholders with limited resources;
 - Actively seeking and acting on advice on how to engage specific groups, particularly disadvantaged and marginalised groups and groups living in remote and regional parts of Australia, and their representatives.

Our organisations represent a wide cross-section of Australians – from home-owners who are actively taking steps to make their homes more sustainable or choosing to build well above minimum standards, to more vulnerable households who are exposed to significant cost-of-living and health costs by living in inefficient homes.

Our independent research and analysis, reinforced by long experience working with vulnerable people and delivering energy efficiency programs, clearly demonstrates that more efficient homes cost less in energy bills to run, are more comfortable and healthier to live in and are more resilient to the impacts of climate change, particularly extreme weather events such as heatwaves. Cutting energy waste through efficiency also represents one of the least cost opportunities for reducing carbon emissions across the Australian economy.

By 2050, buildings constructed after 2019 will likely make up more than half of Australia's building stock and will be home to millions of Australians for decades to come. Raising energy performance standards will make efficient homes the 'new normal', ensuring all consumers – not only the most informed – can enjoy the benefits of healthier, more comfortable homes with lower energy bills.

As we saw in the shift from 5 to 6 Stars, once the higher standard becomes the new industry norm, the purchasing power of volume builders and the spread of new skills and least-cost approaches across the industry combine to reduce costs to virtually zero.

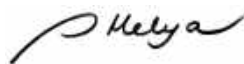
We understand that changes in energy performance standards means changes for the building industry. Over time, changes are manageable for any organisation, which is why we believe it is critical that a clear trajectory for performance increases is put in place, to give industry sufficient time to plan, adapt and roll out more efficient homes across the country. A clear trajectory also gives industry an opportunity to learn from builders who are already building homes well above minimum standards with minimal upfront cost and ongoing energy savings for residents.

We would appreciate the opportunity to discuss these matters with you in further detail, and can be contacted through Anne Martinelli on 03 9631 5424 or annemartinelli@renew.org.au. We look forward to actively engaging in this critical process, to ensure higher energy performance standards are implemented in a way that maximises benefits for Australians while minimising costs to industry and home-owners.

Yours sincerely,



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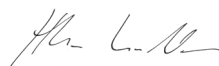
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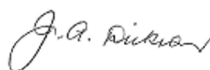
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¹ <https://www.acoss.org.au/wp-content/uploads/2018/12/Final-Joint-Statement-Consumers-call-for-action-on-housing-energy-performance-standards.pdf>