

MUNICIPAL ASSOCIATION OF VICTORIA

5 November 2021

MAV Submission to Australian Building Codes Board

Via online submission.

Dear Sir/Madam

NCC 2022 Residential Energy and Efficiency CRIS

The Municipal Association of Victoria welcomes the opportunity to comment on the NCC 2022 Consultation Regulation Impact Statement (CRIS).

We recommend that:

- Option A presented in the CRIS is adopted in NCC 2022
- The Australian Building Codes Board (ABCB) commit to including residential energy efficiency in the NCC 2025 update, including an option of net-zero regulated energy use
- The ABCB work with stakeholders to ensure future CRIS more accurately reflect the need for and benefits of energy efficiency and emissions reductions

We believe it is short-sighted that an option of net-zero regulated energy use is not assessed. This was included as an option presented in the scoping study for NCC 2022. Net-zero should be the focus of consultation for both residential and non-residential energy efficiency in NCC 2025.

The core consideration of these reforms to the NCC must be their contribution to emissions reduction targets. We are in a climate emergency and already seeing the disastrous effects of a changing climate. None of the options presented go far enough in tackling emissions from buildings?). Delaying implementation of the proposed improvements locks in higher emissions for longer and is a cost we can't afford to pay.

Changes to building regulations only take effect for new construction or significant renovations. This means there is a long lead time before the effects are widespread in building stock. The Australian Sustainable Building Environment Council and ClimateWorks Australia estimate that 49% of buildings standing in 2050 would have been built prior to 2019. This increases the pressure to act now.

Improved energy efficiency also contributes to amenity, resilience, and housing affordability. In most circumstances additional up-front costs are more than offset by savings in running costs. For many households these savings will exceed any additional mortgage costs from day one. We do not believe the CRIS has accurately modelled these benefits.



Our understanding is that the current timeline for future NCC reviews is to examine only non-residential energy efficiency in 2025., We believe delaying the next review of residential energy efficiency until 2028 is far too late. Both residential and non-residential energy efficiency should be reviewed in 2025.

We echo concerns expressed by many stakeholders including the Victorian Government and the Council Alliance for a Sustainable Built Environment that the CRIS is short-sighted. Benefits are estimated very conservatively, while costs appear inflated. We urge the ABCB to work with stakeholders to understand these flaws and be able to address them in future CRIS processes.

Yours sincerely

A handwritten signature in black ink, appearing to read 'K Thompson', with a stylized flourish at the end.

KERRY THOMPSON
Chief Executive Officer