NCC Public Comment Draft
Response Sheet

This response sheet is to be used for submitting responses to the National Construction Code (NCC) 2022 Public Comment Draft.

Response Sheet

Your details

Name: Kerry Connors

Organisation: Energy Consumers Australia

Email or Phone No: kerry.connors@energyconsumersaustralia.com.au

Response(s)

NCC Volume(s): ☐ One ☒ Two ☐ Three ☐ Housing Prov. ☐ Livable Housing

Clause/Figure/Table: H6 F1

Recommended change to draft:

N/A

Comment/reason for change:

Energy Consumers Australia strongly supports the changes made to H6 Part 1.

The revised objectives are a welcome recognition of the multiple benefits of improving the energy efficiency of a home, and supported by a growing and substantial evidence base demonstrating the link to high energy bills and poor health outcomes.

NCC Volume(s): ☐ One ☒ Two ☐ Three ☐ Housing Prov. ☐ Livable Housing

Clause/Figure/Table: H6 Introduction to this Part

Recommended change to draft:

This Part is intended to improve **the efficient use of energy** to reduce greenhouse gas emissions from buildings.

Comment/reason for change:

To align with H6O1 Objective, which identifies benefits in addition to the reduction of greenhouse gas emissions.

NCC Volume(s): ☐ One ☒ Two ☐ Three ☐ Housing Prov. ☐ Livable Housing

Clause/Figure/Table: H6P1

Recommended change to draft:

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Comment/reason for change:

Energy Consumers Australia supports the changes made to H6P! to establish thermal efficiency standards for new detached homes.

Improving the thermal efficiency of a dwelling has multiple benefits for occupants, particularly

- reduced energy usage, which should enable lower energy bills. Unnecessarily high bills place undue pressure on household budgets. Our most recent Energy Consumer Sentiment Survey, which tracks consumers' attitude and confidence, found energy affordability was consumers' priority and greatest fear. It found 62% of respondents were very concerned about the affordability of energy going forward, with 73% of respondents concerned about affordability for others.
- improved comfort and amenity – ECA's Power Shift research assessed data collected through the $56m Low Income Energy Efficiency Program which found consumers identified significant benefits to their health and wellbeing through even relatively minor improvements to the thermal comfort of their home. That has been consistently supported in other research (see Daniel, Moore, Baker, Beer, Willand et al 2020,).
- Improved health outcomes – the thermal efficiency of buildings is well established as a critical influence on health outcomes (see Baker, Beer, Lester et al 2017 for an overview of that evidence base).
- resilience to warmer and extreme weather and power outages.

There are also significant societal and economic impacts in the short to longer term (see the Power Shift Multiple Impacts Framework).

- increasing the resilience of the electricity grid during times of peak demand, potentially deferring or negating the need for expensive investment
- reducing carbon emissions
- lower healthcare spending arising from occupants' better health
- increased economic growth and employment.

Energy inefficient housing also disproportionately impacts low-income households, renters, and apartment dwellers, whose capacity to improve their homes is limited.

The evidence base demonstrates immediate and longer-term significant benefits to households from improved energy efficiency standards, which outweigh the costs of improving the thermal efficiency standards.

Energy Consumers Australia sees the 2022 changes to the National Construction Code as a first step along the policy pathway outlined in the Trajectory for Low Energy Buildings to meet a net zero target. Along with the need to better integrate consumers' energy assets, like solar PV and batteries, the 2022 changes should be seen as the minimum standard, and one that industry should endeavour to better.

These changes should continue to recognise that the housing and energy markets exist to serve consumers, and so place consumers at the front of policy-making and regulatory decisions.

NCC Volume(s): ☐ One ☒ Two ☐ Three ☐ Housing Prov. ☐ Livable Housing

Clause/Figure/Table: H6P2

Recommended change to draft:

Set energy budget for Class 1 Homes as equivalent to Net Zero Regulated Energy

Comment/reason for change:

Energy Consumers Australia supports the inclusion of an energy usage budget for new homes, but is of the view that it could be strengthened further, to aim for net zero regulated use

and notes that the ABCB scoping study identified a strong degree of support for net zero regulated energy.

NCC Volume(s): ☐ One ☒ Two ☐ Three ☐ Housing Prov. ☐ Livable Housing

Clause/Figure/Table: Part J1 Introduction to this Part

Recommended change to draft:

This Part is intended to improve **the efficient use of energy** to reduce greenhouse gas emissions from buildings.

Comment/reason for change:

To align with J1O1 Objective, which identifies benefits in addition to the reduction of greenhouse gas emissions.

NCC Volume(s): ☒ One ☐ Two ☐ Three ☐ Housing Prov. ☐ Livable Housing

Clause/Figure/Table: J1O1

Recommended change to draft:

N/A

Comment/reason for change:

Energy Consumers Australia strongly supports the changes made to Part J101.

The revised objectives are a welcome recognition of the multiple benefits of improving the energy efficiency of a home, and supported by a growing and substantial evidence base demonstrating the link to high energy bills and poor health outcomes.

NCC Volume(s): ☒ One ☐ Two ☐ Three ☐ Housing Prov. ☐ Livable Housing

Clause/Figure/Table: J1P2

Recommended change to draft:

N/A

Comment/reason for change:

Energy Consumers Australia supports the changes made to J1P2 to establish thermal efficiency standards for new apartments and units. We note that CSIRO data records 30% of new certificates for apartments already achieving a NatHERS rating of 7 stars or higher, demonstrating that industry can meet this standard.

As noted in our comments on the NCC 2022 changes for new detached homes, improving the thermal efficiency of a dwelling has multiple benefits for occupants, particularly

- reduced energy usage, which should enable lower energy bills – unnecessarily high bills place undue pressure on household budgets. Our most recent Energy Consumer Sentiment Survey, which tracks consumers' attitude and confidence, found energy affordability was consumers' priority and greatest fear. It found 62% of respondents were very concerned about the affordability of energy going forward, with 73% of respondents concerned about affordability for others.
- improved comfort and amenity – ECA's Power Shift research, assessed data collected through the $56m Low Income Energy Efficiency Program which found consumers identified significant benefits to their health and wellbeing through even relatively minor improvements to the thermal comfort of their home. That has been consistently supported in other research (see Daniel, Moore, Baker, Beer, Willand et al 2020,).
- Improved health outcomes – the thermal efficiency of buildings is well established as a critical influence on health outcomes (see Baker, Beer, Lester et al 2017 for an overview of that evidence base).
- resilience to warmer and extreme weather and power outages.

There are also significant societal and economic impacts in the short to longer term (see the Power Shift Multiple Impacts Framework).

- increasing the resilience of the electricity grid during times of peak demand, potentially deferring or negating the need for expensive investment
- reducing carbon emissions
- lower healthcare spending arising from occupants' better health
- increased economic growth and employment.

Energy inefficient housing also disproportionately impacts low-income households, renters, and apartment dwellers, whose capacity to improve their homes is limited.

The evidence base demonstrates immediate and longer-term significant benefits to households from improved energy efficiency standards, which outweigh the costs of improving the thermal efficiency standards.

Energy Consumers Australia sees the 2022 changes to the National Construction Code as a first step along the policy pathway outlined in the Trajectory for Low Energy Buildings to meet a net zero target. Along with the need to better integrate consumers' energy assets, like solar PV and batteries, the 2022 changes should be seen as the minimum standard, and one that industry should endeavour to better.

These changes should continue to recognise that the housing and energy markets exist to serve consumers, and so place consumers at the front of policy-making and regulatory decisions.

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Clause/Figure/Table: J1P3

Recommended change to draft:

Strengthen stringency of energy budget to equivalent of 4-Star heat pump space conditioning

Comment/reason for change:

J1P3 sets a maximum energy use budget for apartments, equivalent to 3-Star heat pump space conditioning, 5-Star gas instantaneous hot water and lighting power density of 4W/m2; it can be offset with onsite renewables where feasible.

Energy Consumers Australia supports the introduction of energy budgets to set limits on the energy use of fixed appliances that can be offset with onsite renewables where possible. While the proposed performance requirement is an improvement on current regulations and should be included as a bare minimum, we believe the stringency could be further strengthened.

The *Trajectory for Low Energy Buildings* proposed higher efficiency levels for appliances in apartments than those set in this performance requirement, including the equivalent of 4-Star heat pump space conditioning. We are not persuaded of the value in resiling from that recommendation.