

Submission Template

Residential Buildings Mandatory Disclosure – Consultation Regulatory Impact Statement - July 2011

Overview

This submission template should be used to provide comments on Residential Building Mandatory Disclosure Consultation Regulatory Impact Statement (CRIS).

Contact Details

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Confidentiality

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Do you want this submission to be treated as confidential? Yes No

Submission Instructions

Submissions should be made by **close of business** on 12 September 2011. The Department reserves the right not to consider late submissions. Please restrict your submission to 4 pages of comments

Where possible, submissions should be lodged electronically, preferably in Microsoft Word or other text based formats, via the email address – residentialdisclosure@climatechange.gov.au

Submissions may alternatively be sent to the postal address below to arrive by the due date.

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General/overall comments

In general, I think it is great that the ball is rolling on this issue and I hope that the right decisions are made for our environment and our sustainability into the future. However I must express a level of scepticism that the right decision will be made and that what is likely to happen is a lesser option of assessment will be adopted. In real terms and if we stick to the only objective of the proposed legislation, to lower greenhouse gas emissions then there is only one option, **OPTION 1**. I am a little concerned that that option 2 was already being championed as the most saleable cost effective option and that the most effective option, option 1 was being painted in an unfair light to make it appear too costly. If we are going to do this then we need to do it right, and that means full modelling using plans by accredited assessors.

C-RIS Section number: <i>[insert section number eg 3.1]</i>	
Comparison Of Regulatory Options	<p>In regards to the 4 options listed in Table ES 1.1 and the fifth option not shown, it is of my opinion that any option that relies upon self assessment is flawed from the start. It is not in the best interest of this policy to have unqualified people doing assessments on their own properties, when they have an invested interest in manipulating the numbers. These options run the risk of serious misconduct and not being taken seriously at all very quickly.</p> <p>This only leaves option 1 and 2. It is of my opinion that option 1 is the only option that is going to give any benefit to co2 emissions which is after all the only aim of this proposed legislation. The problem I have with a checklist style of assessment (option 2) is that in this field so much of the end result comes down to nuance and accuracy. Slight changes to the information can have large impact on the end result. Therefore a checklist style assessment has the potential to assess a two house as equals, where in reality they could be stars apart.</p>
Option 1 Assessment cost	<p>In table ES 1.2 NET PRESENT VALUE OF COSTS AND BENEFITS, BY OPTION COVERAGE (\$M)</p> <p>I have a problem with the way the price attributed to the assessment for option 1 has been figured. I realise this is a hard figure to come up when there are so many different opinions on how reach a fair amount or even agree on what it would take to achieve an option 1 assessment.</p> <p>So here's my opinion.</p> <p>The first thing that needs to be agreed upon is the amount of information needed to do an accurate assessment. As a minimum you must have,</p> <ul style="list-style-type: none"> -Up to date architectural plans, whether provided or not. -Position and sizes of all windows. -Detailed list of what the building is constructed from. -Eaves details eg. Width, The pitch of the roof -Floor coverings in each room -Orientation of the site <p>This is a list of the MINIMUM requirements for a thermal assessment only(looking at how the structure itself performs thermally), we could go a lot further and include the lighting and fixed house hold appliances such as dishwashing machine, hot water service, oven, heater's and air-conditioning units etc. into the assessment. This would give us a much better impression</p>

	<p>on how a house will perform with someone living in it. To complete an assessment on the average house using the MINIMUM amount of information, I would estimate it would take. -4-5 hours to measure an existing house -4-6 hours to then draw the plans electronically from the hand drawn on site measurements, the better the on site measurements the quicker this process is -3-7 hours to provide an assessment -if all information(plans etc.) is provided, 3-7 hours So for a house where no information is provided I could see it taking around 17 hours, at lets say \$100 dollars an hour= \$1700</p> <p>Of course for a house where all the information is provided the cost will be much lower, around \$500. Now I realise that the suggested price might differ from person to person but from my experience and advice I have received this is a perfectly reasonable price. So as you can see I think that the figure provided in Table ES 1.2 will need adjusting. This would have a big impact on the Net Present Value performance of option 1. The total cost now being \$2962 and the benefit being \$3474 Giving option 1 a net benefit of \$512</p>
Approved Software	<p>I do not have a great deal of experience in using the available software. To my knowledge the main front runners are First rate 5 and BERS pro. A colleague of mine has had extensive experience with first rate 5 and does not speak highly of it at all. I'm sure you will be receiving plenty of remarks to this affect. Whether there should be one software that is used nationwide or there is a list of approved programs to use. The only thing I would say is that the training should be as similar as possible between states.</p>
Training	<p>Whether there should be one software that is used nationwide or there is a list of approved programs to use, I'm unsure. The only thing I would say is that the training should be as similar as possible between states. I think the TAFE system is best suited to do the training.</p>

Net Present Value	<p>I'm a bit concerned with the way in which the net present value is calculated. It seems to me that the only values taken into consideration are immediate monetary values. Now I understand that this the easiest way in which to way up the feasibility of a piece of legislation, but I feel that with issues concerning the improvement of the environment we have to look a little longer term for not only monetary but benefits our society as a whole.</p>
Table 4.2	<p>Under option1 you have a household waiting cost of \$50. I think this is way too low, if for example someone had to come on site and measure the house up it would mean in most cases half if not a full day not at work.</p>