

## Submission

### 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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A request made under the *Freedom of Information Act 1982* for access to a submission marked confidential will be determined in accordance with that Act.

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

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### General/overall comments

Lighting Council Australia is the peak body for Australia's lighting industry. The Council represents manufacturers and suppliers of luminaires, control gear, lamps and associated technologies.

Lighting Council Australia supports the requirement for new or existing residential houses, townhouses or units to have an Energy Efficiency Rating (EER) Statement prepared by an accredited assessor, if they are to be sold or leased. The EER is to be based on option 1 of the Consultation Regulatory Impact Statement.

The EER is to be provided by the seller (vendor) when selling or leasing. Where any existing EER is no longer representative a new rating should be provided.

Lighting Council has been actively involved with government and others in the development of other energy efficiency schemes. We have also been actively engaged in other aspects of energy efficiency mainly with the minimum energy performance of products. This additional step will assist in reducing energy use by addressing a long known absence of incentive, especially where a building is subject to a lease and the tenant pays the energy bill.

| C-RIS Section number: <i>[insert section number eg 3.1]</i> | Comments  |
|---|---|
| Table 4.2 option 2 assessment cost.                         | The \$172 assessment cost shown is unrealistically low. Assume an approved assessor office/travel costs are based on \$100/hr. This allows 1.75 hrs to travel to/from site, discuss/explain information with client, assess project and write up results. This implies 4 assessments could be done per day. To complete above, it is expected 2 sites could be complete per day. Accordingly costs will double. This reduces the cost disparity between option 1 and 2. |
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