

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

All submissions will be treated as public documents, unless the author of the submission clearly indicates the contrary by marking all or part of the submission as 'confidential'. Public submissions may be published in full on the Department of Climate Change and Energy Efficiency or other relevant Government websites, including any personal information of authors and/or other third parties contained in the submission. If any part of the submission should be treated as confidential then please provide two versions of the submission, one with the confidential information removed for publication.

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

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

- 1
RESIDENTIAL BUILDINGS MANDATORY DISCLOSURE (RBMD) WILL PLACE A COST ON OWNERS
- 2
RBMD CANNOT BE A PRECISE ASSESSMENT (AS VARIANCE BETWEEN RATINGS OF GREEN STAR AND NABERS ETC AT THIS TIME) AND WILL CONFUSE BUYERS
- 3
RBMD WILL CREATE AN INDUSTRY THAT DOES NOT EXIST (THE ASSESSORS)
- 4
RBMD PROCESS WILL BE UNDULY INFLUENCED BY SUCH A GROUP/AN INDUSTRY THAT HAS A VESTED INTEREST IN SUPPORTING RBMD
- 5
THE VARIANCES IN HOW A BUILDING WORKS – NATURAL VENTILATION, HIGH RISE WINDOWS AND HOT AIR ESCAPE, SHADING OF TREES, BLINDS AND HOW BLINDS ARE USED – FOR HEAT GAIN INTERNALLY AND HEAT EXCLUSION - ARE EXAMPLES OF VARIANCES IN MEASUREMENT THAT WOULD MAKE ANY ASSESSMENT GENERAL AT BEST AND USELESS IN MOST CASES EXCEPT EXTREMELY COMPETENT DESIGNS OF WHICH PERHAPS 5% EXIST.
- 6
RBMD WILL BE A COST TO GOVERNMENT WHERE INVESTMENT ON FACTORS HAVING MORE IMPACT ON GLOBAL WARMING COULD BE MADE > CONTAINMENT OF GROWTH, IMPROVEMENT OF PUBLIC TRANSPORT, DISTRIBUTION OF WORKPLACE OPPORTUNITIES
- 7
RBMD WILL INCREASE GOVERNMENT STAFFING
- 8
RBMD IS BEING RECOMMENDED BY A GROUP/ORGANISATIONS/INDIVIDUALS THAT SERVE TO GAIN FROM ESTABLISHMENT BY FUNDING, INCREASED JOB OPPORTUNITIES OR PROMOTION OR BOTH AND AS SUCH THE RECOMMENDATIONS ON ITS VALIDITY MUST BEAR SEVERE AND INDEPENDENT SCRUTINY
- 9
RBMD FAILS TO ACKNOWLEDGE THE INDIVIDUAL USE OF THE HOUSE – THE MANAGEMENT OF ENCLOSURE TO THE ELEMENTS AND AS SUCH THE ESD EFFICIENCY. THE GREATEST ESD DESIGN WILL BE A GLOBAL WARMER IF THE OCCUPANTS USE A HEATING SOURCE AND DO NOT CLOSE DOORS, GAPS, WINDOW OPENINGS OR HAVE AC UNIT RUNNING WHILE WINDOWS OPEN
- 10
RBMD APPLIES ANOTHER LAYER TO AN ALREADY COMPLEX BUILDING PROCUREMENT PROCESS
- 11
COMMON SENSE CAN STAND BY PURCHASERS IN ASSESSING BUILDINGS WITHOUT THIS OVER REGULATORY APPROACH
- 12
THE BENEFITS ARE FAR OUTWEIGHED BY THE COST OF IMPLEMENTATION AND DISRUPTION

TO ESTABLISHED PROCEDURES AND THE RELATIVE WORTH

SUMMARY
THIS RBMD SHOULD NOT BE PURSUED

C-RIS Section number: <i>[insert section number eg 3.1]</i>	Comments