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Sent: Monday, 12 September 2011 4:24 PM
To: DCCEE - Residential Disclosure
Cc: TRusten@gwagroup.com.au; CReed@gwagroup.com.au
Subject: Submission for Consultation RIS on Residential Building Mandatory Disclosure
Attachments: submission CRIS Mandatory disclosure Residential buildings September 2011.doc;
Response to the CRIS on Residential Building Mandatory Disclosure.doc

Please find attached response to CRIS.

LEN PLACE

Corporate Affairs Manager



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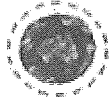
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Submission Template

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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Date:	9 September 2011

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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9 September 2011

Dear Sir / Madam,

Response to the CRIS on Residential Building Mandatory Disclosure

GWA Group Limited is Australia's leading supplier of building fixtures and fittings to households and commercial premises; the Company has approximately 2200 employees with manufacturing and distribution facilities located across Australia.

GWA Group comprises GWA Bathroom and Kitchens, GWA Heating and Cooling and GWA Door and Access Systems.

GWA Bathroom and Kitchens [GWABK] is Australia's foremost designer, manufacturer, importer and distributor of domestic and commercial bathroom and kitchen products. GWA Bathroom and Kitchens is at the forefront of product innovation incorporating water saving technology, and is the market leader in water efficient sanitary ware and tap wear.

GWA Heating and Cooling [GWAHC] manufactures and distributes through a national network solar, heat pump, gas and electric water heating products for the residential market and is at the forefront of developing highly energy efficient solar driven products.

GWAHC and GWABK consider mandatory disclosure for residential buildings as a positive step towards fostering an energy and water efficient culture by raising the awareness of industry and the consumer on a dwelling's performance and subsequent running costs and GHG emissions.

With one in four dwellings tenanted and residential market churn rate reported as every six to seven years, there is a sizable amount of housing stock where running costs are not part of any appliance replacement or product purchase decision, as split incentives and return on investment are not important to the decision maker.

This together with a general lack of understanding of the type of actions that can be taken to improve the energy and water efficiency profile of a dwelling makes it difficult for



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the consumer to make informed decisions at time of appliance replacement or renovations.

The CRIS put forward 6 options for consideration, four regulatory and two non regulatory.

This submission supports the adoption of a regulatory option applied to the sale or lease of the dwelling and applying to the thermal performance of the building envelope as well as the performance of fixed appliances as the most appropriate approach.

In addition, consumer confidence in the scheme would be best served by regulations to ensure the integrity of the performance ratings that will become of every increasing importance in the consumer's decision making processes.

The CRIS highlights the growing problem of peak demand and the benefits of delaying future high cost infrastructure expenditure if the residential load profile can be reduced or smoothed out.

The RBMD should be established and administered to allow the recognition and adoption of new and evolving energy and water efficiency technologies quickly to reduce running costs, emissions and utility infrastructure expenditure.

Finally, the success of the RBMD will be enhanced by a comprehensive public education program of the benefits to the consumer of improved energy efficiency performance in the dwelling's running costs and GHG emissions.

Thank you for the opportunity of responding to the CRIS and we look forward to our continuing involvement with the development of the RBMD.

Yours sincerely,

Len Place
Corporate Affairs Manager