

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).

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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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Canberra ACT 2601*

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General/overall comments

Mandatory Disclosure – Regulation is essential to protect “innocents”.
 An opt out 1 star rating at least draws attention to the point.
 The cost benefit analysis takes current charges into account. I expect these will change as the practice becomes more widespread.
 More homes are being built with a star rating, the cost benefit does not necessarily apply to them.
 As a home assessor working in particular with low-income families I find that unknown property performance can severely impact on the budget through high energy costs.
 Whilst the building envelope is important, so too are the fittings that are installed.
 Many people that I have advised have large numbers of halogen lights and inappropriate HWS which are not necessarily shown on plans and are not part of NaBERS rating systems.
 Therefore I think that rating off the plan gives the best overall information, a walk-through is essential.
 The star ratings should note the types of fittings at the date of inspection.

C-RIS Section number: <i>[insert section number eg 3.1]</i>	Comments I cannot find this in the documents received so have tried to reference in an understandable way
Option One	This provides the best information on the planned building envelope, there is no guarantee that the home has been built to the specifications. It does not look at the fittings and fixtures, whilst these may not be considered permanent, they should be included and recommendations made. It is crucial that this be independent advice.
Option Two	This will be essential for homes that do not have plans or where the home has been built differently or where there are extensions.
Option Three	This is not independent and therefore there is no quality control. The person undertaking it may not have sufficient understanding of the issues involved or the tools and skills required to measure performance
Option Four	Too simplistic to be meaningful
Option Five	These components are useful but they will not necessarily improve performance as they do not address behaviour change in any meaningful way.
Option Six	Opt out with one star at least raises the issue. It may not be sufficient for people to understand the implications of their agreement.