

## 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](mailto:residentialdisclosure@climatechange.gov.au)

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

*Residential Energy Efficiency  
Department of Climate Change and Energy Efficiency  
GPO Box 854  
Canberra ACT 2601*

## Residential Buildings Mandatory Disclosure – Consultation Regulatory Impact Statement (CRIS)- July 2011

### General/overall comments

To make a meaningful impact on Building energy efficiency, we need to address the existing house stock. Little impact will occur from the energy efficiency measures introduced for new buildings in the short term.

Improvements to energy efficiency in existing house stock will be best lead (rather than legislatively driven) by the use of full thermal efficiency statements at the time of sale. With simplified thermal assessments at time of lease.

This system would be a market price adjusting system. As buyers were able to compare a new house with existing houses, the market would put a price on the energy efficiency or otherwise of a property, as well as factor in the cost of the work. It would not bring any difficulty to the real estate market. It would generally be more cost effective for the energy efficiency improvements to be made by the vendor prior to sale, but would not preclude a sale, if it were left to the purchaser. (much as buyers and sellers value and price asbestos roof replacement)

There are sufficient funds in the system to subsidise the work. Stamp Duty is an unpopular tax. Perhaps work that was carried out to a star rating level may be able to be rewarded with stamp duty reductions. There is also the existing White Certificates scheme that may be used to provide funds for some of this work. The development of accredited Building Energy Rating operatives together with the verification of remedial work carried out would provide a way to ensure that the insulation debacle was avoided. The existing white certificate system would be utilised to provide some funds back into housing out of the energy distribution industry.

This is an opportunity to put funds into the housing industry, without just subsidising house prices. For many years, Australia has provided employment through the housing industry. The general ability to just continue building new houses may have come to an end.

The opportunity to gain good jobs creation, by investing in energy conservation is unparalleled in efficiency. Jobs creation in an economic structure that provides the savings to fund. Energy saving to provide the cash to drive the jobs, energy saving up the supply chain ie minimising load on the distribution infrastructure. Carbon saving. As well as an opportunity to drive refurbishment of older housing stock.

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