

Robinson, Renee

From: John Mabb [johnmabb@hotmail.com]
Sent: Thursday, 11 August 2011 8:25 AM
To: DCCEE - Residential Disclosure
Subject: RIS comments
Attachments: RIS building disclosure submission.doc

Categories: forwarded for the scribe, Green Category

Please see my attached submission outlining my comments on the RIS Residential Building Mandatory Disclosure.

Regards,

John Mabb

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

Name of Organisation:	
Name of Author:	John Mabb
Phone Number:	07 5582 8844
Email:	johnmabb@hotmail.com
Website:	
Date:	11 August 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.

*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

The problem is the low level of sustainability of existing residential building stock and the lack of knowledge of the prospective future owners or tenants of this stock. Disclosing this information will educate future occupants of the expected functionality and associated costs of the dwelling and may show a preference over time towards dwellings which demonstrate a higher level of sustainability.

To this end the reporting on sustainability should be broadened to include waste management and transport options. The identification of features such as kerbside recycling and green waste collection and the frequency or proximity to public and active transport infrastructure would provide a more holistic representation of the sustainability of the occupation of that dwelling in that locality.

Option 2 seems to be a balanced approach between a thorough assessment and an affordable cost.

C-RIS Section number: <i>[insert section number eg 3.1]</i>	Comments
Appendix C4	<p>The future increase in electricity costs associated with network and distribution price rises should be considered on a state by state basis based upon the submitted regulatory impact statements supplied to AER by the Energy distribution businesses. These can be significantly different than the 4% assumed.</p> <p>The carbon tax price outlined in the Treasury modelling released on 10 July should be considered.</p> <p>These costs will more accurately demonstrate the financial benefit of action to decrease energy consumption.</p>
Appendix C9	<p>The penetration of halogen lights in modern building stock should be modelled. Queensland sustainable housing code requires 80% of floor space to be energy efficient lighting and so an assessment of existing building stock should be compared.</p>
Section 2.3	<p>The sustainability declaration process currently in operation in Queensland is a pseudo voluntary scheme because if you do not know an answer to a question you can leave the question blank. The real estate industry applied a great deal of pressure when this scheme was rolled out because they could not advertise the property until the sustainability declaration was completed. This resulted in a major simplification of the requirements.</p> <p>The market was also swamped with pseudo professional sustainability consultants willing to charge a small fortune to fill in the declaration on behalf of the owner. If a national system is rolled out then suitable minimum qualifications need to be set or the result will be similar to the federal insulation program where inexperienced, unqualified operators provide substandard service to an uninformed consumer.</p>