

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

The Master Plumbers' and Mechanical Services Association of Australia is a registered national employer organisation providing representation and extensive services for a broad base of members in the plumbing and mechanical services sectors. The principal activities of the Association are to provide business services, industry representation, training and advice on industrial relations and employment to the membership. Our members represent a powerful and reputable group to lobby government in support of various plumbing, business and environmental recommendations.

Every year Australian plumbers carry out many thousands of plumbing projects that relate to water and energy usage in buildings. It is clear that plumbers will be at the frontline of sustainable change as we move towards a more sustainable built environment that improves the wellbeing of the community and reduces greenhouse gas emissions. As an industry stakeholder we welcome this intervention to introduce the mandatory disclosure of building energy, greenhouse and water performance for residential properties. We believe that it is a necessary step to improve the environmental performance of our building stock.

The Master Plumbers' Association would like to comment on several aspects of the options that have been proposed in the regulatory impact statement.

National consistency

Our first comment is a general statement with regards to the proposed implementation of the program.

The Master Plumbers' Association understands that while the government objective to introduce mandatory disclosure is national, the legislative responsibility of implementation, regulation and oversight will rest with the various state and territory governments. We see this as a significant disadvantage of the proposal because it undermines national consistency. This issue is highlighted by the programs currently in place in ACT and Queensland which offer vastly different approaches to the issue of disclosure. Unless the national system is regulated at a national level we have concerns that varied approaches will still be implemented within the different jurisdictions. We liken this situation to the current Australian Vocational Education and Training (VET) system in which we have a suite of national Training Packages, the implementation of which is managed by state and territory education departments. This has resulted in significant variations in funding, delivery hours, training/assessment outcomes and quality regulation between the jurisdictions. The variation has implications in an era of national occupational licensing which seeks to confirm reciprocity between states and territories.

The Master Plumbers' Association strongly recommends that a national regulatory body manage the implementation of mandatory disclosure using standardised materials and assessment tools to ensure a consistent approach in each state and territory.

C-RIS Section:	Comments
<p>Chapter 4 Options to achieve government objective</p>	<p>The Master Plumbers' Association supports a disclosure program that is mandated and regulated by legislation.</p> <p>We suggest a voluntary program will have limited take-up and is likely only to be utilised by individual/families who have already taken steps to improve the water and energy efficiency of their house. A voluntary program is unlikely to result in sustainable upgrades to the remaining significant proportion of the building stock that is not energy or water efficient. Unfortunately highlighting the potential health and environmental benefits of improving building sustainability is esoteric and not sufficient to encourage broad participation.</p> <p>We do however support the notion of an 'opt out' option on a mandatory program. This would be within the parameters of a building that it obviously going to be demolished or significantly remodelled.</p> <p>We support the notion that a certificate of disclosure be produced and lodged as part of the compliance process.</p>
<p>Section 4.1 Regulatory options 1 - 4</p>	<p>The Master Plumbers' Association supports regulatory Option 2 (assessor based assessment with simplified thermal simulation) as the preferred option for the disclosure of building water and energy efficiency information.</p> <p>We suggest this option as the most efficient means of gathering and reporting valuable information while retaining an appropriate level of cost effectiveness in relation to potential assessment charges. Stakeholder advice indicates that it may prove difficult and expensive to obtain accurate floor plans for many existing houses, particularly older style homes. This means Option 1 (full thermal simulation) is likely to be too expensive and difficult to mandate.</p> <p>We would comment however that householder behaviour has a significant impact on the efficiency of any house. Any mandatory disclosure model and assessment report must reference sustainable household behaviours in relation to energy and water usage as well as include recommendations for behaviour change. We recommend this aspect be included in mandatory disclosure training program content and assessment tool development.</p>
<p>Section 4.2 Non-regulatory options</p>	<p>As noted above the Master Plumbers' Association does not support a non-regulatory or volunteer disclosure program.</p>
<p>Chapter 5 Impact analysis</p>	<p>The Master Plumbers' Association comment in this section relates to the impact we believe mandatory disclosure may have on the plumbing industry, predominantly because we see plumbers as having a significant role as mandatory disclosure assessors.</p> <p>We suggest that only trained and independent assessors should undertake the assessment of, and report on, the energy and water efficiency of buildings. Assessors will require a specific set of skills and knowledge to analyse the different components of a building to determine its potential performance. They will also require specialist knowledge to provide recommendations to home owners on upgrades, improvements and behavioural change. Home owners and untrained assessors are therefore inappropriate.</p> <p>We believe that plumbers, provided they have completed appropriate additional training, are well placed to undertake the role of assessors. Plumbers are familiar with residential household systems that offer energy and water efficiencies such as heating and cooling, hot water and clothes drying systems. These are noted as major components of the potential performance of a building. Plumbers are also specialists in emerging environmentally sustainable technologies such as solar heated water, heat pump and geothermal technologies that may be recommended as upgrades to improve the house performance.</p>

Many plumbers would offer mandatory disclosure assessments as an additional service within their existing business. This would be a 'value add' to their business, particularly for their current clients, thus improving the breadth of their business. We see this as a positive outcome for the industry.

Training

We strongly recommend that the mandatory disclosure program be supported by a nationally (educationally) accredited and industry approved training program that must be delivered by a Registered Training Organisation (RTO). The lack of an accredited training course was a significant issue in the government Home Insulation Program.

For your reference, the Master Plumbers' Association currently offers a nationally accredited environmental plumbing short course to plumbing practitioners, *22079VIC Course in Green Plumbers Environmental Solutions*. This qualification contains the unit *VU20197 Carry out environmental plumbing inspections* that focuses specifically on the skill and knowledge required to undertake and report on residential household inspections and provide recommendations to improve energy and water efficiency. Our existing course could be simply amended to include training on lighting and conducting a simple assessment of thermal performance and the building shell which would address all the areas of assessment proposed for mandatory disclosure.

Given our expertise in this area, the Master Plumbers' Association would be pleased to work with the government project steering committee in the development of the supporting accredited training program for this intervention.