

## 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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<b>Date:</b>	12 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?**

**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.

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### General/overall comments

- ⤴ Competition in the Residential Thermal Performance Assessment industry will result in significantly lower estimated costs for Option 1 MD thermal simulations, with discounts where floor plans are supplied. We can do a full NatHERS Star Rating from \*.pdf drawings in about 1 hour (not 3 hours as in Table D.3), add ~30 minutes for Certification and reporting. Additionally, to draw a house plan to the accuracy required for thermal analysis takes us about 45 minutes (not 90 minutes). (Our total for Option 1 ~\$440 for no plans and ~\$340 with plans)
- ⤴ Provided with an MD Report that lists cost-saving measures will empower the new owner or occupier to consider improvements. Based on observations in the renovation industry, the likelihood of low payback period project implementation would be more like over 80% within 5 years.
- ⤴ The assumption of no rise in energy/water costs should be changed to ~5%/year increase in real-costs (in line with projections from Utilities).
- ⤴ To be mathematically correct the NPV 7% per year Benefit discount is not linear but should be 93% of the previous year. The analysis will then indicate that some benefits will have a much longer impact (commensurate with the remaining life of the building).
- ⤴ The ACTHERS scheme is not well enforced and data suggests variable disclosure from 10 to 20% (Trevor Lee and Yuelin Wang 2009, Mandatory Disclosure of Energy Efficiency for Residences – History and Compliance in the A.C.T. Sales and Rental Markets, ANZSES Conference). Any Mandatory Disclosure scheme must have visible enforcement and realistic penalties to gain industry confidence.
- ⤴ A Building Sustainability Assessor can report on a range of economic improvements that could be considered by the householder with estimated costs and calculated benefits.
- ⤴ I recommend the retention of Star Ratings for the reporting of Energy Efficiency of existing buildings using the same calculations, procedures and assumptions as required for certified NatHERS assessments for Code Compliance, because this enables comparison between new and existing buildings (minimising confusion and enhancing existing industry knowledge and experience of Star Ratings for new homes). If you use anything less than a full Star Rating assessment procedure with certified assessors in Options 2 and 3, you should NOT use the Star metric. Perhaps the Star Rating can be supplemented with a CO<sub>2</sub> eq metric. This could be included with a check-list style (Option 4) for features or energy efficiency of specific fixed appliances, water efficiency, access and safety etc. (like the Sustainability Declaration used in Queensland). This specific Option was not investigated but is a mix of Options 1 and 4 similar to the November 2009 draft version of the Qld. Sustainability Declaration.

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