

# 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

<b>Name of Organisation:</b>	Building Energetics Pty Ltd
<b>Name of Author:</b>	Darli Aynsley
<b>Phone Number:</b>	(07)54710649
<b>Email:</b>	Darli@buildingenergetics.com
<b>Website:</b>	www.buildingenergetics.com
<b>Date:</b>	September 12, 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](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

If the software to be used is AccuRate then Mandatory Disclosure is not acceptable at all. AccuRate has been the subject of many studies which show it to be very inaccurate in its estimation of indoor air temperature and therefore the energy efficiency of residential buildings. One building currently monitored records temperatures 7 deg less than AccuRate calculations. Other comfortable passive houses fail with poor ratings because of this discrepancy.

AccuRate is inadequate in estimating the effects of air movement in cooling occupants (adaptive thermal comfort). This is through natural ventilation or fans.

Why is AccuRate assessing itself through government funding? A third party should be doing this assessment.

No matter what software is used the source code for the software should be available so that suggestions for improvements/corrections SHOULD be available for assessment.

The imposition of this disclosure - at people's own cost - is wrong when the software is so inadequate. It is preferable that the actual energy used as be measured such as with Nabers software,

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