



**Australian
Institute of
Architects**

ABN 72 000 023 012
The Royal Australian Institute of Architects
trading as Australian Institute of Architects

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8 June 2022

Hon Elise Archer MP
Attorney-General
Minister for Workplace Safety and Consumer Affairs
10th Floor, Executive Building
15 Murray Street
HOBART TAS 7000

By email to: elise.archer@dpac.tas.gov.au

Dear Minister Archer,

RE: TASMANIA'S COMMITMENT TO RESIDENTIAL ENERGY EFFICIENCY IN THE NATIONAL CONSTRUCTION CODE 2022

The Australian Institute of Architects (Institute) is the peak body for the architectural profession in Australia. It is an independent, national member organisation representing over 12,500 members across Australia and overseas. More than 300 of these are based in Tasmania and are supported by the Tasmanian Chapter.

The Institute is committed to a net zero carbon building and construction industry by 2030 and to achieve this we support the Australian Building Codes Board (ABCB) in delivering a step change in the 2022 National Construction Code (NCC) residential energy requirements. We call on the Rockliff Government to legislate and enforce all updates included as fast as possible.

Australia is overdue for better building standards. It is over a decade since the current 6-star minimum NatHERS rating was introduced. Since then, Australia's performance has fallen behind comparable countries, where the energy efficiency of new buildings is typically up to 40% better¹.

Residential buildings are responsible for around 24% of overall electricity use and 12% of total carbon emissions in Australia². Energy efficiency in residential buildings can have a significant impact on Tasmania's economy and the health and well-being of Tasmanians. Energy efficiency can reduce the need for government energy infrastructure investment, lower household energy bills, improve occupant health and comfort (particularly in a warming and drying climate), and reduce carbon emissions from gas consumption. The Energy in Tasmania Report 2020-21³ states that the Tasmanian gas market continued to grow with the number of Tasmanian residential and small business gas customers increasing by 2.6 and 6.7 per cent respectively, continuing the increase in gas customer numbers in 2019-20. This trend is contrary to the action required to address climate change.



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In October 2021 the Institute delivered a submission to the ABCB on their Consultation Regulation Impact Statement (CRIS) and supported the move to 7 NatHERS Stars as a first step towards achieving net zero homes. The Institute also acknowledges that the introduction of a stringent Whole of Home energy budget would make a significant contribution to reducing carbon emissions and household energy bills. The proposed changes are clearly supported by the cost and benefits analysis undertaken for the CRIS by Tony Isaacs Consulting⁴ which shows the suitability of all Tasmania's NCC climate zones for the proposed energy efficiency upgrades.

The Institute understands that the submissions from the CRIS process have now been considered by the ABCB and a final Regulation Impact Statement is currently being drafted for discussion at their June meeting. We also understand that Peter Graham, Executive Director, Consumer, Building and Occupational Services, Department of Justice will attend this meeting. Subsequently, at the Building Ministers Meeting in July, it is expected that you will be asked to endorse the final draft NCC 2022 for publication in September.

The Institute is interested to know when you and your department expect to receive the final RIS and what industry consultation process will be conducted to support the development of Tasmania's response.

In my role as the Tasmanian Chapter President, I would like to meet with you to discuss the proposed NCC changes, and Tasmania's proactive advocacy with the ABCB Board over the coming years to accelerate necessary building regulation in response to climate change. Our Tasmanian Executive Director, Jennifer Nichols will be in touch with your office to arrange a time.

Yours sincerely,

Stuart Tanner
President, Tasmanian Chapter
Australian Institute of Architects

Jennifer Nichols
Executive Director, Tasmanian Chapter
Australian Institute of Architects

CC: Peter Graham, Executive Director, Consumer, Building and Occupational Services,
Department of Justice, by email to: Peter.J.Graham@justice.tas.gov.au

¹ Moore, T., Berry, S., Ambrose, M., 2019. Aiming for mediocrity: The case of Australian housing thermal performance, Energy Policy, Volume 132, Pages 602–610. DOI: <https://doi.org/10.1016/j.enpol.2019.06.017> .

² Department of Industry Science Energy and Resources www.energy.gov.au/government-priorities/buildings/residential-buildings .

³ Tasmania Economic Regulator, March 2022, www.economicregulator.tas.gov.au

⁴ Isaacs, T., 2021. Cost and Benefits of upgrading building fabric from 6 to 7 stars, www.consultation.abcb.gov.au/engagement/consultation-ris-proposed-ncc-2022-residential/