



Australian
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Architects

TAS

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Department of Justice
Office of the Secretary
GPO Box 825
Hobart TAS 7001

By email to: haveyoursay@justice.tas.gov.au

Re: Building Amendment Bill 2025

To whom this may concern,

The Tasmanian Chapter of the Australian Institute of Architects (the Institute) would like to provide feedback on the Building Amendment Bill 2025 (the Bill) and the Building Amendment Regulations 2025 (the amendment regulations).

We acknowledge Minister Barnett's positive outlook around the freeze of the National Construction Code (NCC) until 2029 and note that the consultation period is provided to 'ensure everyone has an opportunity to provide input into the legislation.'

The Institute welcomes this invitation and recognises the ongoing industry consultation around the minimum standards in the NCC, and particularly the need in Tasmania for further research around the NCC provisions. The Institute notes the pause of the NCC may have an adverse impact on innovation around items such as condensation, health and bushfire – intended under the NCC performance solutions. The Institute notes that Tasmania is currently out of alignment with other jurisdictions regarding the NCC, following the decision not to adopt the residential energy efficiency standards. This pause would cause further misalignment, and risks leaving the Tasmanian economy and its community excluded from important benefits, opportunities and efficiencies. The Institute notes that the design profession and construction industry should still strive for compliance with the NCC 2025.

The Institute would like to acknowledge the meeting that was held with the Minister's senior advisor, CBOS staff and Daniel Lane, the Institute's Tasmanian President in

December, which allowed the opportunity to discuss the potential implications of the proposed NCC freeze in more depth. The Institute is also meeting with the Minister for Housing and Planning in February and will also convey these issues to him.

Condensation

Whilst there is proposed to be a pause on the implementation of the NCC 2025, it should be noted that Tasmania has implemented condensation management measure for a number of years through the requirements of the *CBOS Condensation in Buildings – Tasmanian Designers Guide*. These measures exceed the current requirements of the NCC and play an important role in ensuring the ongoing health, safety, and durability of residential buildings.

While the NCC provides minimum safety standards, as a state code it does not adequately address the long-term condensation risks. It also does not respond to climate-specific factors – such as driving rain and air pressure differentials – that can drive vapour into building envelopes and result in unintended durability, health and safety consequences.

Institute members hope that the current pause provides an opportunity to develop appropriate, high-performing construction approaches before the large-scale rollout.

Energy Efficiency

The Institute is aware that Tasmania has not yet fully adopted the residential energy efficiency requirements of the NCC 2022 edition.

While the Institute acknowledges commentary regarding the increased construction costs associated with raising dwellings from a 6-star to a 7-star NatHERS rating, it considers that the energy savings realised by households during occupation can outweigh the additional upfront costs.

The Institute is concerned that this misalignment with the rest of the country may result in Tasmania and its community missing out on important benefits, opportunities, and efficiencies in residential buildings.

Livable Housing

In terms of the progression on livable housing design in an aging population, the Institute supports an explicit and guaranteed progression pathway for accessibility provisions in the legislation. The Institute does however, note that the incorporation of these guidelines will cause an increase in the size of buildings, due to the nature of the guideline specifications, and therefore an increase in building cost.

The proposed freeze of the NCC has the potential to provide an opportunity to review the guidelines, their requirements, and the practical constructability of its implementation, allowing concerns and issues raised by members of the Institute, and those in the construction industry to be addressed prior to the NCC rollout.

Thank you for the opportunity to provide feedback on the proposed Bill and the amendment regulations. The Institute would appreciate being involved in ongoing conversations regarding these issues. Please contact us if you would like to discuss any of the points raised further.

Kind regards,



Daniel Lane
President, Tasmanian Chapter
Australian Institute of Architects



Jennifer Nichols
Executive Director, Tasmanian Chapter
Australian Institute of Architects

The Australian Institute of Architects (Institute) is the peak body for the architectural profession in Australia. It is an independent, national member organisation with over 14,500 members across Australia and overseas. The Institute exists to advance the interests of members, their professional standards and contemporary practice, and expand and advocate the value of architects and architecture to the sustainable growth of our communities, economy and culture. The Institute actively works to maintain and improve the quality of our built environment by promoting better, responsible and environmental design. To learn more about the Institute, log on to www.architecture.com.au.