



**Australian  
Institute of  
Architects**



**ENGINEERS  
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Landscape Architects



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08 August 2022

Hon Roger Cook  
Deputy Premier; Minister for State Development, Jobs and Trade; Tourism; Commerce;  
Science  
13<sup>th</sup> Floor, Dumas House  
2 Havelock Street  
WEST PERTH WA 6005

Dear Minister

## **JOINT STATEMENT:**

### **SUPPORT LIFTING ENERGY PERFORMANCE STANDARDS FOR NEW HOMES IN THE NATIONAL CONSTRUCTION CODE (NCC) UPDATE 2022**

We represent a broad network of built environment professional and industry organisations urging you to support the increased energy efficiency requirements for new homes at the next Building Ministers Meeting.

Making homes more energy efficient will benefit all Western Australian households. It will lead to significant and ongoing energy bill savings for households, better health outcomes, greater resilience to weather extremes. The changes will also cut our emissions and less need to invest in expensive generation and network augmentation. It will help make the transition to renewable energy faster and cheaper.

It has been over a decade since Australia meaningfully increased the minimum energy efficiency requirements for new homes in the NCC, which have only been adopted in Western Australia since 2019. Since then, Australia's performance has fallen behind comparable countries, where the energy efficiency of new buildings is typically up to 40% better<sup>i</sup>.

Residential buildings are responsible for around 24% of overall electricity use and 12% of total carbon emissions in Australia<sup>ii</sup>. Energy efficiency in residential buildings can have a significant impact on WA's economy while also improving reliability of the WA energy



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grid. We have seen growth in household air conditioning being a major contributor to peak electricity demand and a key driver for investment in electricity infrastructure.

**We call on you to adopt proposed new energy performance requirements for residential buildings in the NCC 2022 update with a 12-month transition period to ensure time for industry training and education.**

The proposed energy provisions follow a collaborative 3-year process led by the Australian Building Codes Board (ABCB), consistent with the *Trajectory for Low Energy Buildings* agreed by all Commonwealth, state and territory energy Ministers in 2019. The ABCB's proposals for new homes include raising the minimum thermal performance standard from 6 to 7 stars (NatHERS equivalent) and the introduction of a 'whole-of-home' energy budget for fixed appliances (heating and cooling, hot water, lighting, and pool and spa pumps).

The proposed changes are supported by the cost and benefits analysis undertaken for the CRIS by Tony Isaacs Consulting<sup>iii</sup> which clearly shows the suitability of all Western Australia's NCC climate zones for the proposed energy efficiency upgrades.

Our organisations recognise and strongly support the intent of these proposed reforms – as Ministers noted after their meeting in March 2022, these improvements are *part of a broader national effort to manage cost of living pressures for households, while making a strong positive contribution to decarbonising our economy.*<sup>iv</sup>

Lifting energy performance standards will:

- Cut energy bills. The ABCB finds that households will be up to \$576 a year better off compared to business as usual<sup>v</sup>. Savings on energy bills will be larger than the home loan cost of upfront improvements.<sup>vi</sup>
- Cut emissions by up to 15 million tonnes to 2030, and 78 million tonnes to 2050 nationally.<sup>vii</sup>
- Make homes healthier and more resilient. Houses that are too cold contribute to 6% of deaths in Australia – double the rate in Sweden<sup>viii</sup>. There were 36,000 deaths in Australia associated with the heat between 2006 and 2017<sup>ix</sup>, with heat waves predicted to worsen.
- Make energy more affordable for all by managing energy demand and reducing the cost of grid upgrades by up to \$12.6 billion to 2050<sup>x</sup>. Efficiency is a key measure to reduce the impact of volatile wholesale prices on households.
- Reduce poverty and inequality as people living in all new social housing and private rental will benefit from cheaper energy bills and better health outcomes.



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All Western Australians have a right to a safe, healthy, comfortable and affordable home.  
Now is the time to lift energy performance standards for new homes.

Yours sincerely,

**Sandy Anghie** RAIA

STATE PRESIDENT WESTERN  
AUSTRALIA

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**Susan Kreemer Pickford** FIEAust CPEng  
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**Vicki Lummer RPIA**

WA STATE PRESIDENT

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CC: Saj Abdoolakhan, Executive Director Building and Energy  
Department of Mines, Industry Regulation and Safety

<sup>i</sup> 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>

<sup>ii</sup> Department of Industry Science Energy and Resources [www.energy.gov.au/government-priorities/buildings/residential-buildings](http://www.energy.gov.au/government-priorities/buildings/residential-buildings).

<sup>iii</sup> 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/](http://www.consultation.abcb.gov.au/engagement/consultation-ris-proposed-ncc-2022-residential/)

<sup>iv</sup> *Building Ministers' Meeting Communiqué March 2022*. <https://www.industry.gov.au/news/building-ministers-meeting-communique-march-2022>

<sup>v</sup> *Consultation Regulation Impact Statement*. <https://consultation.abcb.gov.au/engagement/consultation-ris-proposed-ncc-2022-residential/>

<sup>vi</sup> Renew 2021. *Households Better Off: lowering energy bills with the 2022 National Construction Code*. <https://renew.org.au/advocacy/climate-resilient-homes/households-better-off-lowering-energy-bills-with-the-2022-national-construction-code/>

<sup>vii</sup> Climateworks Australia and ASBEC 2019, *Built to Perform*. <https://www.asbec.asn.au/research-items/built-perform/>

<sup>viii</sup> Gasparini, Antonio et al 2015. "Mortality risk attributable to high and low ambient temperature: a multicountry observational study." *Lancet* 2015; 386:639-75

<sup>ix</sup> Longden, Thomas 2019. "The impact of temperature on mortality across different climate zones." *Clim Change* 2019; 157: 221-242

<sup>x</sup> Climateworks Australia and ASBEC 2019, *Built to Perform*. <https://www.asbec.asn.au/research-items/built-perform/>