



**Australian
Institute of
Architects**

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

WA Chapter
33 Broadway
Nedlands, Perth, WA, 6009

P: (08) 6324 3100
beata.davey@architecture.com.au
architecture.com.au

26 May 2022

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

Dear Minister

RE: WESTERN AUSTRALIA'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 1,100 of these are based in Western Australia and are supported by the WA 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 McGowan 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 – the energy efficiency of new buildings in comparable countries typically being up to 40% better than in Australia¹.

Residential buildings are responsible for around 24% of overall electricity use and 12% of total carbon emissions in Australia².

This means energy efficiency in residential buildings can have a significant impact on WA's economy and the reliability of the WA energy 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.

Energy efficiency can reduce the need for significant government infrastructure investment, lower household energy bills, improve occupant health and comfort (particularly in a warming climate), and reduce carbon emissions.

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 energy bills.



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The proposed changes are clearly supported by the cost and benefits analysis undertaken for the CRIS by Tony Isaacs Consulting³ which clearly shows the suitability of all Western Australia'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 2022 meeting. We also understand that Saj Abdoolakhan, Executive Director Building and Energy, Department of Mines, Industry Regulation and Safety will attend this meeting. Subsequently, at the Building Ministers Meeting in July 2022, it is expected that you will be asked to endorse the final draft NCC 2022 for publication in September 2022.

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

In my role as the Western Australian Chapter President, I would like to meet with you to discuss the proposed NCC changes, and WA's proactive advocacy with the ABCB Board over the coming years to accelerate necessary building regulation in response to climate change. Our National Policy and Advocacy Manager, Beata Davey will be in touch with your office to arrange a time for us to meet with you.

Yours sincerely,

Sandy Anghie RAIA

STATE PRESIDENT WESTERN AUSTRALIA

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

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 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/