

Neil Savery
Chief Executive Officer
Australian Building Codes Board
GPO Box 2013
CANBERRA ACT 2601



13 April 2018

Re. National Construction Code 2019 – Public Comment Draft

Dear Mr Savery

This letter sets out the Energy Efficiency Council's (EEC) key positions on the National Construction Code (NCC) 2019. The EEC is the peak body for energy efficiency, demand management and cogeneration in Australia. Our members include energy efficiency providers, independent experts and various levels of government.

Improving the energy efficiency of commercial and residential buildings will improve the health and wellbeing of occupants and deliver significant bill savings to consumers. Critically, saving energy will also improve the affordability, reliability and sustainability of Australia's electricity systems. Minimum standards for fridges alone reduce Australia's electricity demand by over 500 MW. This 'baseload' capacity is the equivalent of half of the output of the now-retired Hazelwood coal-fired generator and comes at a *negative cost* to consumers.

Setting and enforcing minimum standards for the construction and major refit of buildings is the cheapest and most effective way to improve their energy efficiency, and avoids poor design being 'locked-in' for decades.

The EEC supports the Australian Building Codes Board's (ABCB) intent to increase the stringency of energy requirements for commercial buildings. The EEC also urges the ABCB to improve the stringency of energy requirements for residential buildings as soon as possible.

The EEC also strongly recommends that governments set a long-term vision and process to tighten standards over time to deliver greater savings and more certainty to industry. The Australian Sustainable Built Environment Council (ASBEC) is developing an industry-led vision for improving the standards for both residential and commercial buildings over time. While noting that there are currently limits on the ABCB's role in setting a long-term pathway for building standards, we strongly encourage the ABCB to engage in the ASBEC process to support the development of viable proposals for a long-term pathway.

The EEC looks forward to continuing engagement with the ABCB. If you have any questions please contact me on rob.murray-leach@eec.org.au or 0414 065 556.

Yours sincerely

A handwritten signature in blue ink, appearing to read "Rob Murray-Leach".

Rob Murray-Leach
Head of Policy
Energy Efficiency Council