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Ms S Stephen
Victorian Department of Environment, Land, Water and Planning
8 Nicholson Street
MELBOURNE VIC 3001

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Dear Sarah

Thank you for the opportunity to comment on the proposed changes to the *Victorian Energy Efficiency Target Regulations 2018*. The Housing Industry Association (HIA) would additionally like to thank you for meeting with us to discuss the proposed changes.

Broadly speaking HIA is supportive of State and Federal Government funded or supported programs, such as the Victorian Energy Upgrades program, that provide supportive mechanisms for the voluntary energy efficiency upgrades to existing buildings.

The Victorian program has been in place for nearly 10 years now and is an example of a successful program that supports households and business to voluntarily improve the performance of their buildings and lower ongoing costs.

HIA as Australia's peak residential building representative body participates in numerous state and national committees, working groups, advisory boards and commonly raises concern that policies regarding energy efficiency are predominantly targeted at new buildings, where there is already robust energy efficiency policies in place.

In terms of meeting future energy efficiency targets HIA continues to highlight that new buildings only account for approximately 2% of housing stock and that significant energy efficiency gains can be made by the introduction of successful programs, such as Victorian Energy Upgrades, that support upgrades to the significant stock of existing building.

Further, for the programs such as this to continue to be successful and have significant market uptake they need to be simple to access, understand and apply. This becomes more relevant in non-metropolitan areas where there is less access to available services but there is a substantial percentage of existing housing that would significantly benefit from incentives for energy efficiency upgrades.

HIA considers that the proposed changes to Regulations including additional 'deeming' activities in conjunction with option for project based activities and relocating the technical details into supplementary 'Specifications' are positive steps to support greater uptake and understanding.

For the proposed changes, HIA has reviewed the Regulations, the RIS and the guideline for the remaking of Specifications and is supportive of the new Regulations and offers the following comments for consideration:

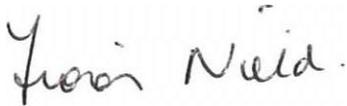
- As noted above HIA is supportive of the relocation of the technical detail from the Regulations into a supplementary Specification.
- As noted in the RIS in moving the detail into the Specifications it facilitates more timely updates where technology changes have occurred.
- The RIS also highlights that there needs to be a process in place for the remaking and consultation on future Specification changes. HIA supports this and the process as outlined in the remaking of Specifications guideline.
- The RIS highlights issues associated with Regulatory overlap between this Regulation and other areas such as Building Codes and Standards requirements, MEPS/GEMS for appliances and we would also add WELs and Plumbing Code of Australia requirements regarding water efficiency.
- Further HIA would recommend that further consideration be given to removing regulatory overlap from the Regulations (and Specifications) where this exists.
- Whilst it is acknowledged that those regulatory instruments are generally focused on minimum requirements where the Upgrades Program is targeted at going beyond minimum standards, however, it is considered that greatest uptake of the program would be for those buildings built before current minimum standards were in place.
- Alternatively, whether consideration could be given to concurrent assessments where some activities would apply to building built pre 2010 and those built after this date.

HIA has concerns relating to the changes to the requirements for solar hot water systems, which we are aware have been raised separately with the Department and HIA would recommended that prior to the Regulations taking effect that further engagement with relevant parties occur to address these concerns.

Finally, the extension granted for providing a response to this matter is appreciated and HIA would welcome further opportunities to provide input into relevant energy efficiency policies matters as they relate to residential buildings.

If you would like to discuss any matters raised please don't hesitate to contact me on 9280 8217 or email at f.neild@hia.com.au or Simon Croft, HIA Executive Director, Building Policy on 02 6245 1300 or email at s.croft@hia.com.au.

Yours sincerely
HOUSING INDUSTRY ASSOCIATION LIMITED



Fiona Neild
Executive Director - Victoria