

Australian Sustainable Built Environment Council position on proposed changes to the National Construction Code 2016

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The Australian Sustainable Built Environment Council (ASBEC) supports a vision of better building outcomes and increased productivity; particularly with regard to increased energy efficiency performance.

The National Construction Code Series 2016 includes proposed changes relating to *V2.6.2.1 Verification using a stated value, JV2 Verification using a stated value* and *Class 2 buildings in JV3*.

Noting that the proposed changes may provide more competition for tools in the market, it is unclear how they would lead to better building outcomes. ASBEC outlines the following concerns:

- The verification method, as it is currently drafted, may lead to perverse outcomes; potentially resulting in inconsistency between models and assumptions that enable poorly designed houses to satisfy the stated values;
- There is no clear administrative body to oversee assessments under the proposed verification method, making it more difficult to achieve compliance and assessor quality control;
- The inclusion of Class 2 buildings in JV3 may result in trade-offs that lead to lower performing units;
- Industry stakeholders have not been sufficiently consulted to ensure that the changes are effective and policy neutral.

We recommend that the proposed changes relating to *V2.6.2.1 Verification using a stated value, JV2 Verification using a stated value* and *Class 2 buildings in JV3* are removed from the draft NCC 2016, and that:

- a) More rigorous modelling and further work is carried to ensure consistency of output under the proposed verification method;
- b) There is a clearly identified and funded administrative function to oversee assessments under any new proposed verification method;
- c) Thorough industry consultation is undertaken to ensure that the proposed changes are effective and policy neutral.

We would welcome the opportunity to work with the Australian Building Codes Board to progress these recommendations, and ensure effective industry engagement in the process of delivering a more rigorous and workable performance-based assessment model for National Construction Code Series 2019.



About ASBEC

ASBEC is the peak body of key organisations committed to a sustainable built environment in Australia.

ASBEC's membership consists of industry and professional associations, non-government organisations and government observers who are involved in the planning, design, delivery and operation of our built environment, and are concerned with the social and environmental impacts of this sector.

ASBEC provides a forum for diverse groups involved in the built environment to gather, find common ground and intelligently discuss contentious issues as well as advocate their own sustainability products, policies and initiatives.

ASBEC is a non-profit volunteer organisation. Members commit their time, resources and energy to developing practical opportunities for a more sustainable built environment.

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