

Please note: this document is a preview of the survey only and is not for submitting feedback. To submit feedback, please complete the online survey on the ABCB [Consultation Hub](#) website.

Overview

About the consultation

Condensation issues in buildings can lead to excessive moisture and mold growth, which can cause adverse health outcomes and building degradation.

The Australian Building Codes Board (ABCB) has been undertaking further work on provisions to mitigate condensation risks. This work builds upon the condensation mitigation provisions included in the 2019 and 2022 editions of the National Construction Code (NCC). The proposed technical changes are in Part F8 (Volume One) and Part 10.8 (ABCB Housing Provisions) of the NCC Public Comment Draft. These changes impact residential and residential-like buildings (Class 1, 2, 3, 4 and 9c buildings). The proposed changes include cavity-dependent vapour permeance requirements for external walls and expanded roof ventilation requirements to better align with practical design and construction practices in Australia.

The ABCB engaged NCEconomics to conduct an impact analysis to evaluate the regulatory implications of the proposed provisions. NCEconomics' report includes a cost-benefit analysis across all NCC climate zones, as well as break-even analysis and sensitivity analysis.

Why your views matter

The purpose of this consultation is to seek your feedback on the consultation impact analysis undertaken on the proposed condensation mitigation measures. The views of stakeholders are fundamental to ensuring the impact analysis is based on the best available information. Questions have been included to guide your responses on specific matters where more information would be particularly helpful in developing the final impact analysis report.

Providing comment

This consultation is open for responses until **11:59PM AEST Monday 1 July 2024**. In line with the ABCB's procedures for undertaking public consultation, comment will only be accepted through the ABCB's online Consultation Hub.

Privacy Collection Statement

1 Important: Please ensure that you have read and understood the below statements before proceeding

Privacy Collection Statement

The Australian Building Codes Board (ABCB) is bound by the Australian Privacy Principles (APPs) outlined in Schedule 1 of the *Privacy Act 1988* (Cth) (Privacy Act), which regulates how entities may collect, use, disclose and store personal information.

Your personal and sensitive information is being collected by the ABCB Office to assist the ABCB to carry out its functions, to inform the consultation process and for other purposes including to communicate with individuals or organisations about their submission.

The personal and sensitive information collected as part of the submission process may be disclosed to and used by the following individuals or organisations:

- the Department of Industry, Science and Resources or the ABCB Office, and the staff of the Department and the ABCB Office;
- the ABCB, its committees and any working groups established by the ABCB, and their staff and advisors;
- the Commonwealth Government, and State and Territory Ministers responsible for building regulation and policy, and their staff and advisors;
- other Commonwealth or State and Territory government departments and agencies;
- any consultant or contractor engaged by the ABCB for the purpose of undertaking work in respect of the subject matter of the submission process.
- any organisation for any authorised purpose with your express consent, for the purposes set out above.

Personal and sensitive information obtained will be stored and held in accordance with the ABCB's obligations under the *Archives Act 1983* (Cth). Further information about how the ABCB collects, uses and discloses personal information is set out in its [Privacy Policy](https://www.abcb.gov.au/privacy-policy) <<https://www.abcb.gov.au/privacy-policy>> .

If you have an enquiry or request relating to your personal information, please contact:

Privacy Contact Officer
Australian Building Codes Board
GPO Box 2013
Canberra ACT 2601



Confidential Information Statement

All submissions and comments will be published unless they are marked 'commercial-in-confidence'. However, any contact details you provide within your submission will be redacted prior to the submission being published.

In order to promote debate and transparency, the ABCB prefers that all submissions and comments be provided in a way that does not require confidentiality to be maintained. However, it recognises that in some circumstances you may want to provide information in confidence.

It is the responsibility of the person making the submission to ensure that any 'commercial-in-confidence' information is clearly identified. Please consider if you can structure your response to keep only some parts confidential. If only part of your submission is confidential, you can provide the confidential part as a separate submission so that the ABCB can publish the non-confidential part of the submission.

Where confidentiality is requested for an entire submission, it will not be published by the ABCB, nor will your name or organisation details; however, see the comments below regarding Impact Analysis.

Please note that we may still disclose the confidential part of your submission to any of the above identified users of the information as part of the consultation process and we will use reasonable efforts to ensure that the recipients keep the submission confidential.

Submissions for Impact Analysis will be made public in accordance with the Office of Impact Analysis' [Regulatory Impact Analysis Guide for Ministers' Meetings and National Standard Setting Bodies](https://oia.pmc.gov.au/resources/guidance-impact-analysis/regulatory-impact-analysis-guide-ministers-meetings-and-national) <<https://oia.pmc.gov.au/resources/guidance-impact-analysis/regulatory-impact-analysis-guide-ministers-meetings-and-national>> .

The ABCB or the ABCB Office may also disclose confidential information in circumstances where:

- we are required or authorised by law disclose it;
- you agree to the information being disclosed; or
- someone other than you has made the confidential information public.

Your submission, comments, opinions and responses will not be published if the ABCB or the ABCB Office considers that your submission, comments, opinions and responses may contain potentially defamatory statements or other offensive comments.

(Required)

Please select only one item

Yes, I have read and understood the privacy collection statement.

2 By making a submission on this consultation you agree to the collection of the information you provide in your submission; and the use and disclosure of the information you provide in your submission as outlined above.

(Required)

Please select only one item

- Publish response
- Publish response anonymously (this will remove personal identifiers including, name and organisation)
- Do not publish response

Personal Information

3 What is your name?

4 What is your email address?

Enter your email address to automatically receive an acknowledgement email when you submit your response.

(Required)

5 What is the name of your organisation?

If submitting comments as an individual please leave blank.

6 Please select your State or Territory

Please select only one item

- ACT
- NSW
- NT
- Qld
- SA
- Tas
- Vic
- WA

7 Which best describes your industry sector?

Please select all that apply

- Building commercial
- Building residential
- Building commercial and residential
- Building and plumbing products
- Building certification / surveying
- Architecture and design
- Engineering
- Plumbing
- Compliance, testing and accreditation
- Legal and finance
- Specialist - disability access
- Specialist - energy efficiency
- Specialist - fire safety
- Specialist - health
- Specialist - hydraulic / plumbing
- Students / apprentices
- Trades and other construction services
- Education
- Community and non-government organisations
- Government
- General public
- Other

If other, please specify

Condensation mitigation survey questions

8 Do you agree with the assumptions used for estimating the prevalence and occurrence of condensation and mold issues?

Please select only one item

- Yes
- No
- Unsure

Please explain your answer and provide any additional information to support your view.

9 Do you agree with the approach to measuring the costs and benefits of the options including the input assumptions/parameters used in chapter 2 of the report?

Please select only one item

- Yes
- No
- Unsure

Please indicate what alternative parameters / methodology you suggest be considered below:



10 The cost-benefit analysis covers two scenarios regarding the mitigation of condensation risks in the external walls of residential and residential-like buildings: drained and vented cavity and no cavity. The analysis assumes the proportion of external walls with a drained and vented cavity is 25% and with no cavity is 75%. Is this a reasonable assumption for the proportion of external walls with a drained and vented cavity and with no cavity?

Please select only one item

- Yes
- No
- Unsure

If no, please provide the percentage range you think is more reasonable for drained and vented cavity walls:

	0%-25%	26%-50%	51%-75%	76%-100%
The share of drained & vented cavity <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please provide any evidence/data regarding the proportion of external walls with a drained and vented cavity:

11 The direct benefits are estimated on the basis of avoided rectification costs. On pages 17 - 18 of the report, there is a discussion on the costs in relation to the type and extent of damage. Do you agree with the assumption that the cost to rectify damage is proportional to the construction costs in Table 5?

Please select only one item

- Yes
- No
- Unsure

If no, please explain your answer and provide any additional information to support your view.

12 The direct benefits are estimated on the basis of avoided rectification costs. On pages 17 - 18 of the report, there is a discussion on the costs in relation to the type and extent of damage. Do you agree with the assumption that the cost to rectify damage is proportional to the construction costs in Table 5?

Please select only one item

- Yes
- No
- Unsure

If no, please explain your answer and provide any additional information to support your view.

13 The indirect benefits from avoided adverse health impacts are the largest driver of the benefits (around 85%). These indirect benefits have been quantified using Population Attributable Fractions (PAF) in combination with Disability Adjusted Life Years (DALYs) and the Value of a Statistical Life Year (VoSLY). Do you agree with these results, particularly those in Table 14 (page 33)?

Please select only one item

- Yes, I think the result is sensible
- No, I do not think the result is sensible
- Unsure

Please provide any feedback on the results below



14 In some climate zones (2, 3 and 4), which are warmer (non-tropical) climates, costs associated with proposed changes outweigh benefits, even though the benefits are greater than costs at the national level. Tell us whether we should still consider including the proposed provisions in climate zones 2, 3 and 4?

Please select only one item

- Yes
- No
- Unsure

Please provide information to support your answer below:

15 Are there any other assumptions or parameters that should be included in the sensitivity or breakeven analysis? This is outlined in chapter 3 (pages 35 - 40).

Please select only one item

- Yes
- No
- Unsure

Please provide information to support your answer below:

16 Are there any other assumptions or parameters that should be included in the sensitivity or breakeven analysis? This is outlined in chapter 3 (pages 35 - 40).

Please select only one item

- Yes
- No
- Unsure

Please provide information to support your answer below:

17 Do you have any other evidence that would make the estimates in the analysis more robust?

Please select only one item

- Yes
- No

If yes, please provide additional evidence below: