

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 ABCBC [Consultation Hub](#) website.

## Overview

### About the consultation

The Australian Building Codes Board (ABCBC) has been undertaking work to scope potential energy efficiency changes for commercial buildings in the next edition of the National Construction Code (NCC). The proposed provisions are included in the NCC public comment draft (PCD).

An in-depth analysis of the impacts (both costs and benefits) of the proposed provisions is now open for comment. This analysis is presented in a Consultation Regulation Impact Statement (CRIS)

This CRIS has been developed by the Centre for International Economics (CIE) in accordance with the [Regulatory Impact Analysis Guide for Ministers' Meetings and National Standard Setting Bodies](https://obpr.pmc.gov.au/resources/guidance-impact-analysis/regulatory-impact-analysis-guide-ministers-meetings-and-national-standard-setting-bodies) <<https://obpr.pmc.gov.au/resources/guidance-impact-analysis/regulatory-impact-analysis-guide-ministers-meetings-and-national-standard-setting-bodies>> administered by the Commonwealth Office of Impact Analysis (OIA).

### Resources

To support stakeholders in providing informed comments, resources are available via the Related Documents section at the bottom of this page. You can access the full [CRIS below](#) <[user\\_uploads/commercial-energy-efficiency-cris-report.pdf](#)> or download a copy at the bottom of this page.

The NCC PCD (the technical provisions) is also open for consultation until **11.59 PM AEST 1 July 2024**. You can view the PCD and supporting documentation on the [ABCBC's Consultation Hub](#) </>.

You will still be able to view the PCD once the public comment period has closed.

### Why your views matter

The input of stakeholders to the CRIS is fundamental to ensuring that the RIS 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 RIS.

### Providing comment

The CRIS is open for responses until **11:59PM AEST Monday 1 July 2024**. In line with the ABCBC's procedures for undertaking public consultation, comment will only be accepted through the ABCBC'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 (ABCBC) 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 ABCBC Office to assist the ABCBC 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 ABCBC Office, and the staff of the Department and the ABCBC Office;
- the ABCBC, its committees and any working groups established by the ABCBC, 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 ABCBC 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 ABCBC's obligations under the *Archives Act 1983* (Cth). Further information about how the ABCBC 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?

*(Required)*

If you enter a valid email address, you will automatically receive an acknowledgement when you submit your response. You will also be provided with a link to a PDF copy of your responses.

The address you enter here will not be published.

5 Please select your State or Territory

*Please select only one item*

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

6 What is your organisation? (if applicable)

### 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

Statement of the problem pages (pages 17 to 37)

8 Has the case for changes to the commercial energy efficiency provisions in the NCC been adequately established in the CRIS?

*Please select only one item*

- Yes
- No (please explain your answer below)
- Unsure

Please provide information to support your response below.

Objectives and options (pages 38 to 48)

9 Are there any non-regulatory options that meet the stated objectives and address the problems set out in Chapter 2 that should be considered?

*Please select only one item*

- Yes
- No
- Unsure

Please provide information to support your response below:



**10** Should the mandatory provision of electric vehicle (EV) charging facilities in commercial buildings be considered as a separate option (rather than bundled together with other proposed requirements)?

*Please select only one item*

- Yes, a separate option.
- No, bundled together with other proposed requirements.
- Unsure

Please explain your answer and provide additional evidence below:

**11** Are there any challenges to implementing any of the proposed options?

*Please select only one item*

- Yes
- No
- Unsure

If yes, please choose from the below:

*Please select all that apply*

- Technical difficulties
- Cost
- Training/ skillset
- Other

Please provide specific and relevant data to support your view.

Approach to impact analysis (pages 49 to 76)

**12** Is the approach to measuring the costs and benefits of each option (including the input assumptions/parameters used) appropriate?

*Please select only one item*

- Yes
- No
- Unsure

If no, please explain your answer and provide evidence below.

**13** Are there any (positive or negative) impacts that have not been adequately covered in the cost-benefit analysis?

*Please select only one item*

- Yes (please explain your answer below)
- No
- Unsure

If yes, please explain what they are and what is the appropriate approach to evaluate them

**14** Do you have any data regarding the baseline assumptions, especially the below?

*Please select all that apply.*

- The average window-to-wall ratio for the different building archetypes
- Window selection (particularly in terms of visual light transmittance)
- The proportion of buildings using external shading
- The uptake of roof top photovoltaic (PV) systems
- The installation of EV charging facilities in new buildings
- The proportion of new fully-electric buildings across different archetypes

Please provide information to support your answer below:

**Please attach a copy of any documents you wish to include to this printout.**  
Data upload

**15** Is there any additional evidence (or data) that could be used to estimate the extent to which modelled energy savings tends to over-estimate or under-estimate actual energy savings?

*Please select only one item*

- Yes
- No
- Unsure

If yes, please provide any evidence to support your response:





**16** Some studies suggest that, for buildings where there are additional costs to comply with the proposed minimum energy efficiency requirements, they are likely to decline over time. Do you have any data or evidence to support the application of a 'learning rate' in the cost-benefit analysis?

*Please select only one item*

- Yes
- No
- Unsure

If yes, please indicate what you would consider an appropriate learning rate and to what building elements it should apply, along with any evidence to support your response.

**17** How do you think proposed energy efficiency changes will affect the safety (including safety from fire) and health, amenity and accessibility?

	Big negative impact	Small negative impact	No impact	Small positive impact	Big positive impact
Effect on safety (including safety from fire) <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Effect on health <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Effect on amenity <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Effect on accessibility <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please provide any evidence to support your response.

**18** Are you aware of any specific electricity network impacts should be considered in the analysis, in addition to those implicitly measured by the electricity pricing?

*Please select only one item*

- Yes
- No
- Unsure

If yes, please provide the specifics of the impacts, and any information to support them.

**19** Do you think if there is an increase in compliance costs such as training costs in addition to the normal continuing professional development requirements?

*Please select only one item*

- Yes
- No
- Unsure

If yes, by how much?

**Building-level impacts (pages 77 to 93)**

**20** Are the cost estimates presented in this chapter reasonable?

*This question refers to tables 5.1 to 5.14 of the CRIS, which can be viewed by on pages 78 to 93 of the CRIS.*

	Yes	No - costs are under-estimated	No - costs are over-estimated	Unsure
Stringency 1 (Table 5.1-5.4) <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Stringency 2 (Table 5.5-5.7) <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Stringency 3 (Table 5.8-5.11) <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Mandatory electric vehicle charging (Table 5.12-5.14) <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>



Please expand on your answer. If you selected no or other, what are your alternative estimates and the basis for those estimates?

**21** Building-level modelling suggests that, for some buildings, complying with the proposed minimum energy efficiency requirements will cost less (compared with the existing minimum requirements in the NCC), while also significantly reducing energy consumption. Do you agree with these findings from the building-level modelling?

*Please select only one item*

- Yes
- No
- Unsure

If yes, please provide information on what prevents building owners/designers from adopting this win-win outcome. If no, please explain your reason.

**22** Which of these factors below do you consider plausible/implausible explanations for the outcome described above?

	Implausible explanation	Neutral/Don't know	Plausible explanation
Requirement to insulate internal walls removed, which will reduce costs without comprising energy performance. <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Size of HVAC system reduced due to more efficient façade. <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Size of HVAC system reduced due to lower thermal loads and changes to HVAC efficiency provisions (e.g. J6D11, J6D5). <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Using darker windows to comply at lowest cost. <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please provide information to support your answer (including other explanations not listed) below:



**23** Achieving compliance with the proposed changes to the NCC may require some design changes to some buildings. How likely are each of these design changes in different type of building?

	Greater use of external shading	Reduced window-to-wall ratio	Use of darker windows	I don't know
Small hotels/motels	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Large hotels	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Small office	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Medium office	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Large office	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Strip retail	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Big box retail	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Large hospital ward	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
School classrooms	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Aged care facility	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

If yes, please provide information on what prevents building owners/designers from adopting this win-win outcome. If no, please explain your reason.

**24** Are the cost estimates of EV charger installation for internal and external car parks appropriate (especially the annual maintenance costs) as reported in tables 5.12 through 5.14 in the CRIS?

*Please select only one item*

- Yes
- No
- Unsure

If no, can you provide alternative estimates?

**25** The net zero carbon ready building provisions (under Option 3) give owners/designers a choice to either: design/construct a dual-fuel building with additional PV capacity to offset greenhouse gas GHG emissions from gas consumption; or design/construct a fully-electric building. Please rank the following factors in order of importance for influencing that decision, with 1 being the most important.

	1	2	3	4	5	6
Lowest upfront cost <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The feasibility of installing ground mounted <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The aesthetic impact of ground mounted solar panels <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lowest expected operating costs (including the relative cost of gas and electricity) <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lowest GHG emissions <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Expectations about future policy settings to encourage electrification <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Aggregate impacts (pages 94 to 118)

**26** The sensitivity analysis considers future electrification, uptake of PV in the base case, regulation period, building and equipment life, discount rate, realisation rate, learning rate, and different assumptions about social cost of carbon and energy pricing. Does it cover the most important factors?

*Please select only one item*

- Yes
- No
- Unsure

Can you suggest any other sensitivities and/or alternative values to the existing sensitivities to consider, and explain why?



**27** Do you agree with the estimates of EV sales induced by the proposed options in the chart 6.24 (page 114) of the CRIS?

*Please select only one item*

- Yes
- No, it is under estimated
- No, it is over estimated
- Unsure

Please provide any evidence to support your response.

**28** In response to the proposed net zero carbon ready buildings options, we assume that: half of the buildings that would have been dual-fuel under current NCC provisions will choose the dual-fuel option (with expanded PV systems to offset emissions from gas consumption); and the other half will choose the fully-electric option. Is this a reasonable assumption?

*Please select only one item*

- Yes
- No
- Unsure

**If no, which of the following options would be the more reasonable assumption?**

	0-25%	26-50%	51-75%	75-100%
Share of building choose the dual fuel option <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Can you suggest any other sensitivities to consider, and explain why?

Final question

**29** Are there any other comments you would like to make in relation to the analysis in the CRIS?

*Please select only one item*

- Yes  
 No

Additional comments

**Please attach a copy of any documents you wish to include to this printout**

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