



Australian Council of Social Service

21 September 2018

The Secretariat
Trajectory for Low Energy Homes
Department of the Environment and Energy
PO Box 787
Canberra ACT 2601

Via email NEPPSecretariat@environment.gov.au

Dear Secretariat

Subject: ACOSS submission on Report for Achieving Low Energy Homes: Final Draft – September 2018

Improved energy efficiency can provide significant benefits to people on low incomes such as lower energy bills, improved health and wellbeing, increased resilience to climate change, while also reducing emissions. ACOSS welcomes the Report's recommendations for the National Energy Productivity Plan (NEPP), including that the Plan should:

- Include a higher thermal efficiency requirement in 2022. We would recommend at least 7.0 star NatHERS equivalent.
- Set a trajectory towards making homes 'zero energy and carbon ready'. We believe it would be helpful to set targets in advance to unleash competition/innovation, and that for there to be a clearly defined process for adjustment over time.
- Allow the inclusion of renewable energy in the National Construction code (NCC). We support the caveat that renewable energy can contribute towards meeting the energy usage budget of a home but not used to offset the thermal efficiency requirements.
- Expand the energy efficiency objective in the NCC to reflect broader policy objectives of energy efficient homes such as lower energy bills, improved health and wellbeing, and climate change resilience.

ACOSS welcomes the Report's acknowledgement that existing homes offer the greatest potential for energy efficiency improvements. We recommend that the COAG Energy Council commit to a national plan to address energy efficiency for existing homes at their 2018 meeting rather than waiting until 2019 and which includes the following measures:

- Mandatory Minimum energy efficiency standards for rental properties.
- Mandatory disclosure of the energy efficiency of a dwelling at the point of lease or sale.
- Minimum energy efficiency standards for minor renovations.
- Assistance for low income households to improve the thermal performance of their homes.
- Continued ratcheting up of appliance energy efficiency standards, with stages and an identified long-term target that allows certainty.

- Continuation and expansion of programs to help low income households replace their old inefficient appliances with new, efficient appliances (such as the NSW Government's Appliance Replacement Offer).
- Programs to assist low income households to access solar PV.
- Behaviour change programs to help households know how to use their energy wisely, without foregoing comfort and health.

If you have any questions, please contact Kellie Caught, ACOSS Senior Climate and Energy Adviser, at e: kellie@acoss.org.au or on p: 040638377.

Yours sincerely,



Dr Cassandra Goldie

Chief Executive Officer, ACOSS