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Office of the Secretary
Department of Justice
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To whom it may concern

The Tasmanian Council of Social Service (TasCOSS) is the peak body for the community services industry in Tasmania. We represent the interests of our members and advocate for Tasmanians living on low incomes.

Introduction

TasCOSS appreciates this opportunity to comment on the *Building Amendment Bill 2025* (the Bill) and the *Building Amendment Regulations 2025* that the Tasmanian Government is proposing to effectively freeze the National Construction Code (NCC).

TasCOSS' interest in the NCC relates to the critical role it plays in setting minimum, nationally-consistent standards for the safety, health, amenity, accessibility and sustainability of certain buildings, in particular, housing.

Tasmania has a housing shortage and TasCOSS supports the Tasmanian Government's commitment to building more homes. However, it is important that new homes are built according to minimum, nationally-consistent standards which continue to improve over time.

TasCOSS welcomed provisions in NCC 2022 that improved liveable housing design and energy efficiency ratings. We are concerned that by freezing NCC, Tasmania is deviating from the higher standards for building quality and safety that the rest of the country is adopting.

TasCOSS also notes and endorses the Disability Voices Tasmania (DVT) submission in response to the Bill. In particular, we share DVT's concern that implementation of the Liveable Housing Standards may not be adopted as a consequence of the Bill.

The False Economy of Freezing NCC

Building poorer quality homes because it is cheaper and faster is not the solution to our housing crisis. This is a false economy that will only result in higher household costs over the long-term. It is cheaper to build energy efficient and accessible homes upfront than to retrofit them, and given Tasmania's ageing population and higher proportion of people living with disability, it is prudent to minimise the need to retrofit Tasmanian homes to be more accessible.

Liveable housing design and better energy efficiency standards for housing will help to tackle poverty and inequality. Higher standards mean everyone living in new homes — including first-home builders, renters and social housing tenants — will benefit from accessible homes, lower power bills and better health outcomes.

Lifting home energy ratings from 6 to 7-stars, as determined in NCC 2022, has benefits for all Tasmanians and is particularly important for the wellbeing of vulnerable cohorts including people with disability, people who are ageing and people living on low incomes.

Tasmania already has some of the oldest, poorest quality, less energy efficient, housing stock. Research by AHURI confirmed *“poor building quality, conditions and environmental performance is prevalent in Australia’s housing stock... [and] ...70 per cent of households reported one or more major building problems.”*¹ This results in many Tasmanians experiencing high energy costs and poor living environments (i.e. too cold or hot) that lead to poor health outcomes.

Research by Renew Australia shows that lifting home energy ratings from 6-stars to 7-stars (as prescribed in NCC 2022) will reduce energy usage by 15%.² By freezing the adoption of energy efficiency measures in NCC 2022, the Tasmanian Government is saying to Tasmanians that it supports household energy bills being 15% higher than they need be.

The Tasmanian Government requires Homes Tasmania to meet a 7-star energy efficiency rating and a minimum Silver Standard under the Liveable Housing Design Guidelines.³ Creating a double-standard whereby new government housing stock is required to meet 7-stars, but not all new housing stock, will leave the majority of Tasmanians in new housing worse off in the long-term.

Conclusion

TasCOSS does not support freezing changes to the NCC that result in poorer quality housing stock or more expensive running costs for Tasmanian households compared to mainland residents.

Continuing to improve the liveability and energy performance of new homes will lead to significant and ongoing energy bill savings for households, less need to invest in expensive upgrades and retrofitting, and better health outcomes.

We encourage the Tasmanian Government to work with the Australian and state and territory governments to make the NCC regulations better, rather than taking action that leaves Tasmanians exposed to inferior building standards.

¹ Daniel, L., Lang, M., Barlow, C., Phibbs, P., Baker, E., and Hamilton, I. (2024), [A national roadmap for improving the building quality of Australian housing stock](#), AHURI Final Report No. 426, Australian Housing and Urban Research Institute Limited, Melbourne, p1.

² McLeod, R & Hoda, A (2021), [Households Better Off: Lowering energy bills with the 2022 National Construction Code](#), Renew Australia.

³ Hon Guy Barnett MP (2023), [Statement of Ministerial Expectations](#), Homes Tasmania, 15 February 2023 p8.

TasCOSS makes the following recommendations:

1. The Bill is withdrawn and the standards in the *National Construction Code 2022* — in particular, the 7-star energy efficiency and liveable housing reforms — are delivered.
2. The Tasmanian Government works with the Australian and state and territory governments to improve National Construction Code regulations that ensure greater productivity.

Yours faithfully



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