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31st August 2009

The Research Director
Environment and Resources Committee
Parliament House
George Street
BRISBANE QLD 4000

RE: Inquiry on the economic and environmental potential provided by energy efficiency improvements and tropical buildings in North Queensland

Dear Sir Madam,

We wish to address two areas concerning tropical building in North Queensland where the economic and environmental costs and benefits arising from energy efficiency improvements are being eroded with potential barriers and impediments to improved energy efficiency. There are potential solutions and policy options for energy efficiency improvements if these problems are rectified including initiatives that are cost effective.

1. Home Owners Insulation Programme

The Home Owners Insulation Programme that is being conducted by the Federal Department of Environment, Energy and the Arts has determined that the roof area over verandahs and patios is not considered as a living area and the insulation rebate does not cover this part of the roof. The Queensland Development Codes now require that all new houses have insulation or a fan for verandahs and patios. The Federal Department of Environment considers that the insulation is not necessary because it is not an air-conditioned space. In the tropics, uncomfortable levels of heat in outdoor living areas cause their use to be abandoned in preference to air-conditioned indoor areas. The Queensland Development Codes recognises this. The decision is causing many instances where only 70% of the roof area is being insulated under this programme. The Federal Department of Environment is clearly lacking a good understanding of tropical housing. The Queensland Government should target policy providers in this department to have the decision concerning the non-inclusion of outdoor living areas in the guidelines reviewed.

2. Proposed 2010 Building Codes Energy Performance requirements.

Building Codes Australia has been directed by COAG to deliver 6 star energy performance compliance in the 2010 codes. Thermal Performance Simulation Software delivering the 6 star rating will be deemed to satisfy provision. The software has known failings as it tries to simulate open tropical design with natural ventilation. There is a threat that naturally ventilated and un-air-conditioned tropical design in Northern Australia may not meet proposed building regulations after May 2010.

A symposium to be held in Townsville on the 19th September 2009 'What killed the Queenslander' may highlight that Building Codes and other government regulation that is driven by needs of colder climates is changing the 'Queenslander'. Vernacular Queensland architecture that uses methods of construction, locally available resources and traditions to address local needs has evolved over time to reflect the environment, cultural and historical values of Queenslanders. This is being undermined and urgent attention is required.

Consideration may be given to strategy that delays the implementation of the Energy Performance Code until the Thermal Performance Simulation Software is further developed to support naturally ventilated tropical design. Queensland must secure a reprieve from the proposed 6 star rating until the software 'BERS Pro' adequately simulates vernacular architecture. The Queensland government should provide the support and funding to the software developers to eradicate the failings.

Public comment on the BCA Regulatory Impact Statement process that is currently examining the effects of the proposed Energy Efficiency provisions for BCA 2010 is due to commence in early September 2009.

If this is not carried out and the 6 star rating prevails in Queensland, air-conditioning reliant houses will be the norm which is unhealthy, energy consuming, contrary to energy saving policy and changing social values.

We welcome contact for further information or clarification.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Thirkell', with a stylized initial 'E'.

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Tropical Green Building Network.

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