

15 October 2021

Mr Neil Savery
Chief Executive
Australian Building Codes Board
GPO Box 2013, Canberra ACT 2601

Via the online consultation hub

**GEA RESPONSE TO THE NATIONAL CONSTRUCTION CODE (NCC) 2022
PUBLIC COMMENT DRAFT (STAGE 2)**

Dear Neil

Gas Energy Australia (GEA) welcomes the opportunity to respond to the National Construction Code (NCC) 2022 public comment draft (stage 2).

By way of background, GEA is the national peak body which represents the bulk of the downstream gaseous fuels industry, which covers Liquefied Petroleum Gas (LPG), Liquefied Natural Gas (LNG) and Compressed Natural Gas (CNG) and a number of members participating in Australia's emerging hydrogen sector. The industry comprises major companies and small to medium businesses in the gas fuels supply chain including producers, refiners, distributors, transporters, retailers, vehicle manufacturers, equipment manufacturers and suppliers, installers, educators and consultants.

GEA is supportive of measures to reduce carbon emissions and improve energy efficiency through changes to the NCC 2022. However, GEA considers it critical to ensure these measures embody technology neutrality and flexibility to ensure buildings are not restricted in which fuels they can use for particular heating and hot water services, particularly as new lower and zero emissions fuels become available.

In the medium to long term, renewable gases, both biogas and synthetic based, will be able to significantly contribute to reducing carbon emissions, while in many cases continuing to use current infrastructure. The contribution from biogas will be highlighted in the Commonwealth Government's soon to be released Bioenergy Roadmap. GEA is concerned that limiting options for the use of gas appliances would curtail the ability for renewable gas to make the sort of contribution the Commonwealth Government and Australian gas industry is envisaging.

GEA shares the same concerns as the Gas Appliance Manufacturers Association of Australia (GAMAA) about energy usage in homes which it covers in more detail in its submission. GEA strongly supports GAMAA's conclusions.

GEA's comments are listed below.

1. Zero Net Regulated Energy Buildings (ZNRE) assigns a cost to carbon emissions and introduces complex metrics for the cost, emission intensity, performance and consumption of energy. As such, GEA considers that these measures may be beyond the scope of a National Construction Code.
2. GEA considers that the changes to the NCC 2022 should be limited to reducing the heating and cooling load of the building itself, via thermal performance, sealing etc. This would result in a reduction in energy consumption which would improve energy productivity, reduce energy bills and carbon emissions and thereby achieve goals set out in the Trajectory for Low Energy Buildings, which underpins the NCC 2022 changes.
3. GEA considers the ABCB should consider the impact of low or zero emission renewable gas which is available now and will become more available in the medium to long term, and in many cases will be able to be used with existing appliances.
4. GEA also has concerns with the ZNRE requirement of increasing solar PV generation from class 1 buildings. Further exploration of the impacts of an increased electrical load in edge of grid areas (where around 28,000 km of Single Wire Earth Return power lines exist just in Victoria) due to an increase in solar PV generation is needed. This impact could be compounded by declining use of gas for space heating and lack of alternative fuelled options due to a preference for electrical appliances in meeting the net energy usage budget in the NCC 2022.
5. GEA does not support the 'societal cost of energy' metric in NCC 2022 as it appears to favour fuel and appliance combinations that have higher carbon emissions, which is contrary to one of the main Trajectory goals which is to reduce carbon emissions.
6. Regarding heat pump heating systems, GEA considers that they encourage efficiency whilst sacrificing user amenity. The end result for many consumers is that actual energy consumption will be considerably higher than that predicted by the rating methodology, particularly in colder climates.

GEA welcomes the opportunity to discuss these issues in greater detail. If you have any questions regarding this submission, please do not hesitate to contact GEA's Policy Adviser Melissa Dimovski at mdimovski@gasenergyaustralia.asn.au.

For your consideration.

Yours sincerely

A handwritten signature in black ink, appearing to read "John Griffiths", with a horizontal line drawn through it.

John Griffiths
Chief Executive Officer
Gas Energy Australia