

P.O Box 952,
Cairns,
QLD 4870

14th September 2009.
Submission to the Hon. Jim Turnour MP for Leichhardt

Dear Jim,

Thank you for the time you took to meet with us. Please find below the information that requires addressing with the Department of Environment, Heritage, Water and the Arts. We look forward to an outcome that benefits sustainable building in North Queensland.

ENERGY EFFICIENCY HOMES PACKAGE – Home Owners Insulation programme
Inclusion of Outdoor Living Areas as part of the programme.

Extract from the programme guidelines:
Living Areas defined:
The area under the roof line of the main dwelling
The areas of the dwelling where people live including sleep, eat, relax, work etc
Where there is a heater or cooling device used in the room to be insulated.
The amount of time spent in the area; and
Whether the area to be insulated is a fully enclosed room."
The areas insulated MUST meet ALL of the above.

The TGBN contacted the Department requesting that the programme include 'outdoor living' areas in Climate Zone 1. Please find the correspondence attached. They decline to include insulation to outdoor living areas as part of the rebate. We maintain our request for re-consideration for the reasons listed below:

- In the north of Australia in particular, the majority of homes have a verandah/porch or outside entertaining area. Many of these also have a cooling system by way of ceiling fans.
- These areas are utilized as living areas for the majority of time home owners are at home. People relax, watch TV and dine in their outside areas.
- In summer, when the outdoor living areas are not insulated, people will move back into the main dwelling and turn on the air-conditioner.
- To ***not*** insulate these areas means that on average only 70% of the actual living area of the home is insulated.
- The Queensland Development Code identifies outdoor living areas and it is now mandatory that insulation and or ceiling fans are installed.

- The rebate has now been running for about 8 months and has another 15 months to run. The problem of retrospective responsibility could be addressed by making a clear statement that a new inclusion of insulating outdoor living areas is not retrospective and would be similar to the recent change of the rebate for landlords. Another option would be to allow for the rebate to occur to the extent of the $1,600 where less had already been used installing insulation under the rebate.

  Kind Regards



Emma Thirkell
Facilitator

Email: emma@greenbuild.com.au

Subject: RE: Home Owners Insulation Program: Placement of insulation above verandahsand patio's in Climate Zone 1. [SEC=UNCLASSIFIED]
From: "Energy Efficiency Household" <EEHousehold@environment.gov.au>
Date: Tue, 18 Aug 2009 15:57:06 +1000
To: "emmagreen" <emma@greenbuild.com.au>

Dear Ms Thirkell,

Thank you for your email.

In the course of developing policy guidance on the implementation of this key initiative, the Government has undertaken significant consultation with industry and stakeholders on planning and design of key components of the measure. At this time, the policy framework for the Package has been been finalised and the formal guidelines are now in effect.

Whilst we appreciate that the Queensland Development Code recognises outdoor living areas and has moved towards mandatory fan and/or roof or ceiling insulation for such areas, unenclosed areas fall outside the scope of 'living area' as defined in the Program Guidelines. As each state and territory government also offer various rebates and assistance packages for household energy efficient measures, the issue of insulating outdoor living areas may be one that you may wish to raise with your state or territory government.

Our aim is to help Australian households operate at higher levels of energy efficiency and we a working towards this goal in cooperation with state and territory governments.

Kind Regards

Energy Efficient Homes Team
Department of the Environment, Water, Heritage and the Arts

From: emmagreen [mailto:emma@greenbuild.com.au]
Sent: Tuesday, 11 August 2009 14:29
To: Energy Efficiency Household; Insulation Feedback
Subject:
Home Owners Insulation Program: Placement of insulation above verandahsand patio's in Climate Zone 1.



To the EEH Team,

RE: Home Owners Insulation Program: Placement of insulation above verandahs and patio's in Climate Zone 1.

Thank you for your response to our email on the 5th of August 2009 that can be found below. The response is not satisfactory and we have cause for concern. Insulation to outdoor living areas should be included in the rebate for Climate Zone 1. The reasons are further outlined below.

In an area that is not fully enclosed, ceiling and under roof insulation **is** effective. It stops heat being transferred to the airspace under the roof.
We all know that it is cooler to stand under a tree on a hot tropical day and there are no walls.

'The most important thing to remember is that in high humid climates where houses are naturally ventilated, high down values and lower up values are appropriate for roofs and ceilings.'
Extract from 'Your Home Technical Manual, section 4.7: Insulation levels for your climate'

In a tropical house that has no air-conditioning, the main intention of roof insulation is to stop heat entering through the roof.
Any trapped heat needs to escape hence the use of insulation products that have low 'up' R values.
Good passive ventilation encourages air to escape and houses in the tropics have very large wall openings and living areas include outdoor verandahs and patios for this reason.

A verandah roof that is un-insulated transfers heat to the living area below. If a breeze or fan removes the heated air under the verandah roof it is more comfortable.
It is now mandatory for new houses to have a fan and **or roof or ceiling insulation** in outdoor living areas:Queensland Development Codes - Sustainable Buildings.
http://www.absa.net.au/Files/Public/Regulations/QDC-%20MP4.1.pdf.

The (QDC) code recognises 'outdoor living areas' and mandates insulation or mechanical ventilation of these built areas in Climate Zones 1 and 2 and in this regard the guidelines of the 'Home Owners Insulation Programme' is in conflict with Queensland legislation.

Network members will be meeting with our Parliamentary Member for Leichhardt on the 26th of August 2009. This correspondence is also being passed to the Centre for Excellence in Tropical Design in Townsville and industry professionals in Darwin.

We hope that your decision may be reviewed.

Yours sincerely,

Emma Thirkell
Network Facilitator.
For more information about the network please see http://www.greenbuild.com.au/forum/ or phone 07 40531274

-------- Original Message --------
Subject: SPAM: RE: Guidelines for Insulation Program and tropical North Queensland [SEC=UNCLASSIFIED]
Date: Thu, 6 Aug 2009 14:07:05 +1000
From: Energy Efficiency Household <EEHousehold@environment.gov.au>

To: emmagreen <emma@greenbuild.com.au>

References: <4A67DECB.2050206@greenbuild.com.au>
<B1730537980C194ABBD8C7548DF53B271F09A0@ACT01VEXCCL02.internal.govt>
<4A7900C8.6090906@greenbuild.com.au>

Dear Ms Thirkell

Thank you for your email.
Please see the definition below for "living area" under the program guidelines:
Living Area – the part of the dwelling that is determined according to the following factors:

- the area under the roof line of the main dwelling;

- the areas of the dwelling where people live including sleep, eat, relax, work etc;
- whether there is a heater or cooling device used in the room to be insulated;
- the amount of time spent in the area; and
- whether the area to be insulated is a fully enclosed room.

Note: Bathroom, toilet and/or laundry are generally considered part of the Living Area if they are not stand-alone constructions

Unfortunately most decks, patios and verandas are not enclosed rooms so they are not considered to be part of the living area.

The main purpose of ceiling insulation is to stop heat escaping or entering through the roof; in an area that is not fully enclosed ceiling insulation would not be effective.

Kind Regards
Energy Efficient Homes Team
Department of the Environment, Water, Heritage and the Arts
www.environment.gov.au/energyefficiency
-------- Original Message --------
Subject: Re: Guidelines for Insulation Program and tropical North Queensland
Date: Wed, 05 Aug 2009 13:47:20 +1000
From: emmagreen <emma@greenbuild.com.au>
To: Energy Efficiency Household <EEHousehold@environment.gov.au>
References: <4A67DECB.2050206@greenbuild.com.au>
<B1730537980C194ABBD8C7548DF53B271F09A0@ACT01VEXCCL02.internal.govt>

To the EEH Team,

Members of the network require the following clarification and we would be pleased if you could assist:

The Program Guidelines V2, defines living area.
In climate Zone 1, a main part of a house where people eat, relax and work is a deck, patio or verandah that is not a fully enclosed room.
Insulation to the ceilings and roofs of this part of a house in a tropical climate makes the area more comfortable, reducing the need for air-conditioned living in the tropics.
Could we please confirm that in Climate Zone 1, a deck, patio or verandah may have insulation installed as part of the program.
I look forward to your response.

Yours sincerely,

Emma Thirkell
Network Facilitator.
For more information about the network please see http://www.greenbuild.com.au/forum/ or phone 07 40531274

If you have received this transmission in error please notify us immediately by return e-mail and delete all

copies. If this e-mail or any attachments have been sent to you in error, that error does not constitute waiver of any confidentiality, privilege or copyright in respect of information in the e-mail or attachments.

Please consider the environment before printing this email.

No virus found in this incoming message.
Checked by AVG - www.avg.com
Version: 8.5.409 / Virus Database: 270.13.59/2310 - Release Date: 08/17/09 18:04:00