

15 May 2018 G Doreian to ABCB CEO Neil Savery Starwars, hiding the real truth to attain Building Energy Efficiency plus reply from N Savery

From: Savery, Neil <Neil.Savery@ABCB.gov.au>

Sent: Tuesday, 15 May 2018 4:13 PM

To: 'doreians@tpg.com.au' <doreians@tpg.com.au>

Cc: McDonald, Matthew <Matthew.McDonald@ABCB.gov.au>; Newhouse, Kevin <Kevin.Newhouse@ABCB.gov.au>; 'Adam Stingemore' <adam.stingemore@standards.org.au>; 'bronwyn.evans@standards.org.au' <bronwyn.evans@standards.org.au>

Subject: FW: letter to ABCB Standards Australia BD 058 [SEC=UNCLASSIFIED]

Dear Mr Doreian,

In relation to the matters you raise in your email below, we make the following comments from the stand-point of the ABCB only.

The claims that you assert about the proximity of big business are baseless and have no bearing on the manner in which the ABCB conducts its work. It has been determined by the nine governments, through the ABCB IGA, that the development of the NCC is a partnership between government and the industry that uses it, however, the policy directions that the ABCB pursues, and the measures that are established through its work, are ultimately determined by governments. Other members of society are provided with the opportunity to have input into this process and often have a great influence on the outcomes. Organisations will inevitably seek to prosecute positions that they believe are in their best interest, however, the ABCB considers these matters on their merits and impartially.

Ultimately it is up to you as to what you want to accept and interpret, but we see no further point in corresponding with you in respect to such assertions.

As for submissions on the public comment draft for NCC 2019, these closed several weeks ago. Unless you provided your comments through that process, those that you raise here will not be considered, however, we note that you offer a number of unsubstantiated opinions and prefer to denigrate those involved in endeavouring to make improvements to the NCC's energy efficiency provisions, rather than advance your arguments based on merit. To consider your comments on these terms would represent an injustice to those, both paid and volunteered, who have committed considerable time and effort to make a constructive contribution to the aims of the exercise.

In respect to matters such as a building climate simulator, this is not a function of the ABCB, and if you feel as passionately about it as appears from your email then you are best raising it directly with government(s).

Finally, whilst the ABCB has input into relevant Australian Standards, it does not determine their content and cannot be a subject matter expert on the breadth of topics covered by such standards. The ABCB has a constructive and respectful relationship with the standards writing body, and works collaboratively in the development of relevant standards. Any matters that you have with a particular standard, however, are best addressed to Standards Australia.

Yours sincerely

Neil Savery

Chief Executive

UNCLASSIFIED

From: Graeme Doreian [<mailto:doreians@tpg.com.au>]
Sent: Tuesday, 15 May 2018 3:00 PM
To: Arquero, Daniel <Daniel.Arquero@abcb.gov.au>; McDonald, Matthew <Matthew.McDonald@abcb.gov.au>; Dodd, Michael <Michael.Dodd@abcb.gov.au>; Goddard, Scarlet <Scarlet.Goddard@abcb.gov.au>; Nielsen, Heather <Heather.Nielsen@abcb.gov.au>; Adam.stingemore@standards.org.au; Andrew.Buchel@standards.org.au; bronwyn.evans@standards.org.au
Cc: tim.renouf@concertinafoilbatts.com
Subject: letter to ABCB Standards Australia BD 058

Good day people,

I realise that this letter is not completely relevant to BD 058, however the interconnecting issues do make it relevant to BD 058, and the ABCB via and its member who resides on a Committee of BD 058.

The letter is relevant to the ABCB, because Standards, set Standards which the ABCB then use to frame regulations.

Everyone is just one big happy co-operative family protecting their own interests. The public, just pay for the privilege.

Further, this letter is relevant to the NCC 2019 Consultation Regulation Impact Statement, Energy efficiency for residential buildings, and although public comment has closed, I formally request this letter be considered as public comment to the NCC 2019 Consultation Regulation Impact Statement, Energy efficiency for residential buildings please.

Yours faithfully

Graeme B. Doreian

Starwars, hiding the real truth to attain Building Energy Efficiency

Starwars, sponsored by the Federal Government of the day, where the defenders (Federal Government Departments) and the aggressors (the ABCB, Standards Australia and ACCC) always win, only losers, the paying public.

Tacticians and beneficiaries: Big business

Casualties: The paying public, with the wounds of potential death, ongoing health issues, higher energy usage and costs that benefits big business and shareholders.

The Australian Building Codes Board (ABCB) have been responsible allowing big business to reside on their panels, a bit like Standards Australia allows the ABCB and big business to manipulate committees (consensus voting, isn't politicking wonderful) for their own benefit.

In the latest saga the NCC 2019 Consultation Regulation Impact Statement, Energy efficiency for residential buildings

The "hotbox syndrome"

What does the ABCB think this means?

How is this created?

Everyone knows how and why, but won't face reality. WHY?

Not only is there a "hotbox syndrome," there are issues with condensation being created by excessive use of bulk fibrous insulation contacting the inner surfaces of building components because there is no gap to allow air movement in the cavity for materials to breath.

Tony Isaacs Consulting

The latest re-hash of the Tony Isaacs, Costs Justification Benefits house designs modelling.

The Impact of Heating and Cooling Load Intensity Limits on NCC Compliance.

Remembering, a forty year lifetime allowance for housing.

All these computer generated housing designs, and insulation guidelines are compromised by user behaviour, Mr Isaacs acknowledges this in his other different reports, therefore there is no credibility of the Isaacs computer modelling, except for some politician to spruik figures to justify a flawed Star rating system and regulations.

Field studies cannot guarantee the same conditions, the same floor plan, and there are no multiple un-occupied same plan buildings.

There has been research in:

- one roomed boxes representing a house? in Tasmania that does not experience hot climatic conditions.
- two roomed boxes representing houses in NSW, where again does not experience hot climatic conditions.

Modelling requires field data, all the field data in Australia is compromised, because basic scientific principles for baseline comparisons have never been conducted, and that can only be in a building climate simulator.

Where is the real time data from a building climate simulator?

Just like the Star rating ANCAP car crash testing, controlled monitored repeatable tests.

Problem with ANCAP ratings these have forgotten what the actual crash testing was about, yes testing the basics, the structural integrity of the vehicle body construction.

These days extra stars are awarded for safety aids, important, but not as much as the basic vehicle shell construction.

Bit like in the building energy Star ratings, an extra star for a

- useless 1000ltr rainwater tank for the toilet.
- ceiling fan outside under the fresco
- whirly bird that removes warm heat from a roof space over winter costing the consumer more to operate their heating system

What a joke, these don't protect the occupants inside the building fabric!

BACK TO THE ISAAC CONSULTATION

There is no mention of antiglare foil at roof level, sorry one mention.

With increasing solar radiation, foil at roof level must be compulsory for every building, more so residential, the ABCB can mandate this.

Using foil at roof level there is a benefit for summer and winter, CSIRO proved this in 2009.

NO MENTION IN THE CONSULTATION

Why isn't it, sorry to expensive, yes just like increasing energy costs for cooling and heating.

FOIL

Any foil mentioned around walls, which basically MEANS, foil facing the inside is useless for insulating, the ABCB know that foil can be an insulator when there is an airgap, every opportunity to increase insulation effectiveness should be enacted on, right, but does the ABCB address this issue, NO. WHY?

PLASTER LINING

Further, when thicker R 2.7 bulk insulation is installed, plaster sheets are very difficult to fix and remain fixed to wall studs because the bulk insulation creates pressure on the plaster sheet and dislodges it most of the time. There is no logic. WHY?

EXTERIOR GLASS

Glass research has established, no amount of glazing panels WILL stop solar radiation.

For cold climates multiple layers of glass are beneficial.

I believe for Australia every residential building, even caravans etc must use double glazing.

This will assist to reduce heat loss, condensation on the inside, and provide increased sound resistance.

Furthermore, the ABCB are aware of issues with the glass Standards that has been ongoing for years.

Why hasn't the ABCB. Oh, we can't interfere in Standards process, yes, the ABCB does, it has a voting member on BD 058

Further, the ABCB makes regulations, when the ABCB make regulations for glass use they are morally bound to ensure that glass is **fit for purpose whether manufactured in Australia or imported.**

Therefore, the ABCB should have worked with Standards to resolve the glass issues years ago. WHY HAVEN'T THEY? WHEN IS THE ABCB GOING TO DO THEIR JOB?

BUILDING ASSOCIATIONS

Remembering, most housing associations reside on Committees in Standards Australia and the ABCB, AND THESE BODIES in general always resist changes, so their members can offer the lowest building price.

WRONG. Some builders offer luxuries valued at \$50,000.00 for \$10,000.00,

I believe reducing energy running costs with correctly used products is more important. RIGHT?

BACK TO THE ISAAC CONSULTATION

Options for the various cities at the back of the report, make a great comedy script, the ABCB must hang their head in shame, the suggestions beg belief, what a joke.

Where is there controlled real time thermal testing, NONE.

The bottom line is the ABCB, the Government, where are they pressing to establish the real verifiable evidence using a building climate simulator big enough to accommodate a full size residential building single and double storey?

The Federal Government can fund a Sea simulator at Townsville to save the Barrier reef, where is there a building simulator to save humans, save them from excessive building and insulating costs, save them from excessive energy bills and finally save life's

Good enough for coral, good enough for humans.

Should the ABCB, the politicians, and their senior bureaucrats develop a conscience, I say this as most in the building scientific community for personal financial reasons have sold their souls, or, had no guts to fight for a building climate simulator.

All they have all done is conducted flawed research, one even granted an AO (Order of Australia) costing the Australia taxpayers I believe, in excess of half a billion dollars.

What a waste, on the day of reckoning line up all the researchers wanting to use a building climate simulator and let them account for their actions.

Very, very few of them deserve any further research jobs using a building climate simulator.

Paid for by the Federal Government, let's have a think tank, an open forum and resolve who may be suitable to use the building climate simulator, on a day where everything is on the table, no tendering, not behind closed doors, no politics, no senior bureaucrats making decisions.

I look forward to a reply, from the ABCB, BD 058, or Standards Australia as an organisation, but expect "stonewalling again on these subjects."

"Silence is Golden" as it demonstrates in this instance there is something to protect, and I believe it is not the public interest, especially with a system that that spruiks "fit for purpose" and Net Benefit.

Yours faithfully

Graeme B. Doreian

Building Energy Consultant

Public advocate witness to the 2014 Royal Commission Home Insulation Program

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