

#### SUBMISSION RESPONSE

The purpose of the document is to explore the feasibility of improving information on the relative energy efficiency of residential properties in the ACT – not necessarily about introducing an EER rating system

The rationale for policies and programs needs to be well founded – agree.

Tenants need high quality information about Energy Efficiency – agree as this is not provided in the current rating system.

## **EER and Sales Properties:**

New homes have had to comply with EER regulation at the time of construction – a good idea. What does not seem to have had any effect on house prices is the imposition of EER's on existing dwellings – we do not agree with the research quoted in 2.3 because in a real market you "cannot hold all other house characteristics constant".

A quick survey of established properties for sale today will show that most of the properties sold for over \$1million recently had EER ratings of less than 2. The importance of the rating is also seen in the prominence it receives in advertising — we would suggest it is only included because there is legislation to enforce it, not because the seller or buyer thinks it is of great significance.

#### **Overseas research:**

Is there any evidence from this report that providing an energy efficiency rating leads to a higher rent?

### Page 13: paragraph 3

One of the best suggestions – there are other solutions to having an EER rating

# Page 15: 4.1

There is no proof that a higher energy efficiency rating will equate top increased rental return for landlords.

## Page 16: 4.3

Energy efficiency is a second order consideration for most tenants AFTER, location, size, dwelling quality and COST – Agreed

# Page 17: Approaches and costs

### **Preferred solution:**

We have absolutely no argument with encouraging property owners to improve the Energy Efficiency of their homes and agree that some form of disclosure would be helpful to tenants.

A more informative approach than an EER rating may be to make it mandatory for owners to provide some essential information – e.g. orientation of living rooms, type of insulation, type of floorcoverings and drapes, are windows double glazed, type of heating, energy rating of any appliances included with the house, use of water saving shower heads, dual flush toilets etc. The market place is already beginning to expect a minimum standard of the above. This would eliminate owners having to go through the costly and inconvenient process of having a computer driven report done before they lease a property.

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