

27 June 2023

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Hon Mick de Brenni MP
Minister for Energy, Renewables and Hydrogen
Minister for Public Works and Procurement
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BRISBANE QLD 4001

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Dear Minister

National Construction Code 2022 implementation

As you know, the National Construction Code 2022 (NCC) commenced 1 May 2023. Provisions pertaining to livable housing and energy efficiency are due to commence in Queensland on 1 October 2023.

For the reasons set out below, Master Builders calls on the Queensland Government to:

1. implement a Queensland Development Code (QDC) variation relating to falls to floor wastes as a matter of urgency; and
2. delay the introduction of NCC provisions pertaining to livable housing and energy efficiency until at least 1 May 2024.

QDC variation

Master Builders has been working with your Department since late 2022 on wording for a proposed QDC variation to enable additional acceptable solutions to meet NCC Performance Requirements for wet areas and gradients to non-mandatory floor wastes.

The NCC provisions in relation to gradients to non-mandatory floor wastes commenced on 1 May 2023. It is more than 8 weeks since the provisions commenced, and industry is still waiting for additional compliance solutions. We call on the Government to implement a QDC variation urgently.

Livable Housing and Energy Efficiency

Master Builders is concerned that industry will not be ready for a 1 October 2023 commencement of these provisions due to:

- The software tool used by the majority of energy assessors in Queensland (BERS) is still not available with updates for latest NCC requirements. As a result, most builders have not had their designs assessed for the relevant zones and potential orientations to determine likely changes

required to the building. It is not a case of simply using other software as assessors are trained and licensed in a particular software tool. Further, the DTS elemental tables are incredibly complex in NCC 2022, and an assessor must still be engaged and able to navigate the new changes. Even once software is updated, there will likely be glitches to be worked through for many months. The timing is now too tight, and commencement of energy efficiency provisions must be delayed.

- Questions remain as to how key livable housing elements will work with other aspects of the NCC, including front door access and weather-proofing, accessible showers and enclosed showers, and renovation requirements. Despite many months of discussions, industry and government have not been able to agree on sensible solutions to our concerns. We believe commencement should be delayed, enabling sufficient time to finalise these solutions.
- Master Builders remains concerned that consumers are unaware of the changes – there has been virtually no consumer education by government, and very little industry information (including for suppliers) by government on the substantial changes to the way buildings must be constructed.

We believe the only sensible path forward is to delay the introduction of the livable housing and energy efficiency provisions until 2024, with immediate progression of a QDC variation for wet area gradient requirements.

Yours sincerely,



Paul Bidwell

CEO