Streamlining and Modernising the NCC

HIA Submission to Consultation

February 2026

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Executive Summary

Under Construction

It is widely accepted that we are in a housing crisis and simply not building enough homes to keep up with demand.

The Productivity Commission identified in their February 2025 Research Paper Housing Productivity: Can we fix it? That the layers and level of regulation through the likes of National Construction Code (NCC), Referenced Australian Standards and broader building and planning laws are a key reason why industry productivity is at 30 years lows.

As Housing Minister Clare O'Neil has stated – it is too hard to build a home in this country. We want builders on site, not filling in forms to get their approval.

The NCC has been singled out from the Productivity Roundtable as one area requiring reform and overhaul – HIA is broadly supportive of this and has been calling for a reset and recalibration for several years.

> *"After years of minor alterations and additions, its time for a knock-down and rebuild of the NCC"*

Since first BCA was produced the number of pages of the NCC is 8.5 times its original length, the number of referenced documents has roughly doubled (from 81 to 169) while the number of defined terms has also risen from 64 to 363 in line with the number and scope of objectives the code deals with.

The NCC has tried to become everything to everyone and lost its clear purpose as a technical minimum necessary building and plumbing code.

Over the past decade a shift in policy focus has occurred and has seen the NCC's goal shift from structural and fire safety to encompass livability, accessibility, sustainability, amenity and slated resilience and adaptation.

Too often, this is to compensate for a lack of reform in other areas. While all well intentioned, a reactionary approach of just adding another new section or clause has led to its continual expansion with negative implications for construction costs and complexity.

Over the last 25 years, the cost to construct housing has increased by 150% because of many factors, but a key factor is significant NCC changes that proceeded despite negative cost benefit assessments.

Affordability cannot be an after-thought in pursuit of special interest goals and the ABCB cannot be immune to the impact ongoing NCC changes have on housing affordability. Housing affordability must be an implicit Goal of the NCC and in turn through the governance of the ABCB.

HIA therefore welcomes this review into a reset, recalibration and modernisation of the NCC – but we would stress that the NCC is only one part of the building regulatory puzzle.

A modernisation and governance overhaul of the NCC and ABCB will not in of itself solve the productivity riddle. Other key parts of the building and planning regulatory system also require a commensurate overhaul.

Bold leadership for comprehensive and sustained reform is needed – and this where the NCC and ABCB, Treasury and Building Ministers nationally can play a leadership role in what good structural reform can look like.

HIA believe this should include a comprehensive deregulation effort targeting a red tape reduction goal of 30% by 2030, focused on unnecessary, excessive and restrictive regulations.

The review, reset and modernisation of the NCC and in turn the ABCB presents a once in a generation opportunity for a true overhaul.

In our words after years of making minor alterations and additions to the NCC – **it is time for a knock-down & rebuild** – to establish a state of the art modern fit for purpose code that works for 2026 and the next decade.

This reset offers the opportunity for a more strategic approach to for a well implemented and understood code.

Technology is moving rapidly and we need to position the NCC for the future – the role of AI, innovation and MMC are difficult to predict and should not dictate our actions but they must be acknowledged a part of the solution both now and increasingly the future.

For too long there has been a major disconnect between the NCC itself, and its supporting standards and tools most buildings use like rating tools which around 90% of homes use.

These must be brought under a single umbrella to improve consistency, accountability and to provide efficiencies for practitioners in their ability to access all the building rules in one place.

In this submission, HIA sets out a summary of recommendations for reform and a suite of transformational opportunities for the development and use of the NCC, how it is developed, consulted on and administered.

Summary Recommendations

HIA calls for a comprehensive suite of reforms including:

Simplification & certainty

1. Move the code to a 5-year amendment cycle to remove the churn of change and provide certainty, stability and consistency for industry.
2. Safety critical changes, errors and editorial improvements and measures that simplify and cut red tape under predictable annual procedural change.

3. Code improvements that focus on expanding alternatives, improved administrative systems, enforcing the gateway model and reducing unnecessary state and territory variations.

Usability

4. A whole of government-endorsed roadmap for an improved ways of providing access and communicating rules, including digital integration of standards.
5. Medium-term priorities including developing better models for interrogating and simplifying code content, along with enhanced tools and national guidance to address known gaps and improve usability.
6. Initial reforms should prioritise simple administrative changes that expand alternatives, improve efficiency, deliver a fully searchable Digital NCC, free access to referenced standards, and improved pathways for innovative systems and Performance Solutions.

Innovation

7. Regulatory processes for MMC, innovative systems and performance solutions be streamlined nationally, including consistent certification pathways and acceptance of trusted international standards.
8. A national taskforce should examine certification, verification and supply-chain responsibilities to support clearer, more efficient approval of innovative construction methods.
9. The NCC expand practical alternatives—such as new DTS provisions, recognition of repeated Performance Solutions, and simplified requirements for low-risk Class 1a buildings—to enable diverse, affordable and efficient housing models.

Governance

10. The ABCB to become an independent national statutory authority with clear objectives, defined roles, strengthened gatekeeping functions
11. Adequate and stable funding for both the NCC's development and the ABCB Office, including for research, new tools, national advice and administration of systems such as NatHERS and standards.
12. Housing industry expertise involvement as Board representatives, and free access to NCC-referenced standards to improve consistency, usability and national implementation.

Introduction

Compared to 30 years ago, home ownership rates for those under 30 in Australia have plummeted by 14 percent. The average cost of a house and land package in our major cities is hitting an all-time high and affordability is a record lows.

This has significant consequences for the welfare and standards of living for all Australians. Not only is this shortfall driving up prices, worsening affordability, and placing enormous pressure on renters and families across the country but also means we are set to fall well below the Government's commitment to build 1.2 million homes over five years. Australia now needs to build around 240,000 new homes per year, every year, to meet alleviate pressures in the housing market.

While undoubtably the result of many factors, HIA and its members believe the ABCB and building Ministers can play a greater role in improving the situation.

The National Construction Code changes have been frequent, large and unsupported present an ever-moving target, which disrupts businesses' ability to predict and plan for the efficient delivery of more housing.

To make housing a priority this review must take a long-term view to remove barriers to the supply of housing and establish settings which contribute to its delivery to encourage more supply and ultimately home ownership.

HIA has well established priorities below, the report provides background to the issues, member feedback and a range of more detailed issues that should be considered under each theme.

The role of the NCC

A National Construction Code (NCC) is an essential component in a regulatory system which has become risk adverse, slow and costly to navigate.

The rationale for the NCC is strongest where it addresses information asymmetries—ensuring that owners and occupants are provided with buildings and products that meet core goals of safety including from fire, structural integrity and health.

Over decades the code has incrementally evolved and now reflects mere preferences or best practice which seeks to regulate quality and is increasingly pressure to address issues which are fundamentally unsuitable like property protection.

Consequently, this often leads to solutions with conflicting objectives (e.g. energy/moisture management, access/water and pest management) which can narrowly constrain the range of conventional technical solutions or other market preferences.

Code objectives and goals are now obscured under layers of rules, poorly understood administrative provisions which themselves have been built on, varied and had other obligations attached.

Too often this is to compensate for a lack of reform in other areas including competence, compliance and integrity of industry participants.

Innovation crowd out

There has been recognition that, the system is unsuitable and unadaptable for Modern Methods of Construction–inspection regimes, repeatability and compliance/verification of systems for which there is no existing standards; Likewise for renovations and the extent the code should and can apply.

These issues are inseparable from the question of stringency, the extent that the NCC can (and should) keep pace with new solutions, reduce liability and require exercise of judgement. In other words, is predicting all building strategies either possible or necessary?

The building regulatory system is fragmented having introduced barriers in some areas that deliberately discourage variation from narrowly defined solutions and consequently has become slow to embrace new products solutions.

In sectors where productivity has been strongest and an innovation culture exists, higher productivity is possible. It is a poor reflection on our system that our industry is unable to identify the 'pay-off' from innovation, and less likely to report reduction in costs associated with pursuing it[1].

Addressing the issues with assessment and innovation for offsite construction is essential but not for the only barrier. Modern onsite methods and new innovations mean addressing one realm, is akin to a race team trying set lap records but asking one driver race to last year's rules and pit every lap.

Better oversight and insight

Key to improvement is recognition adding more objectives more frequently works against industry's ability to deliver more housing.

The current ABCB Intergovernmental Agreement (IGA) contains many of the necessary principles, but become cluttered and lacks focus and status.

To be effective the ABCB must operate under a commitment that compels all parties to act in service of a clear incontrovertible aim to streamline the system, provide certainty on the existing rules, embrace tools, pathways for innovation that don't unnecessarily increase costs for marginal benefits and predictability to decisions.

Housing industry expertise must be part of the decision-making process, a Chair that has a strong building industry connection and representatives of the Board. State, Territory and

[1] See ABS, Innovation in Australian business, 2022-23 financial year, Cat. no. 8158.0, https://www.abs.gov.au/statistics/ industry/technology-and-innovation/innovation-australianbusiness/latest-release

Federal Government representatives must be heads of Department's and be authorised to make policy decisions on behalf of that government.

HIA advocate to keep what is good, fix what is broken and fill in the gaps and complete construction of the code.

Another renovation won't solve these issues, it is time for a knock-down rebuild.

Theme one: Governance and process

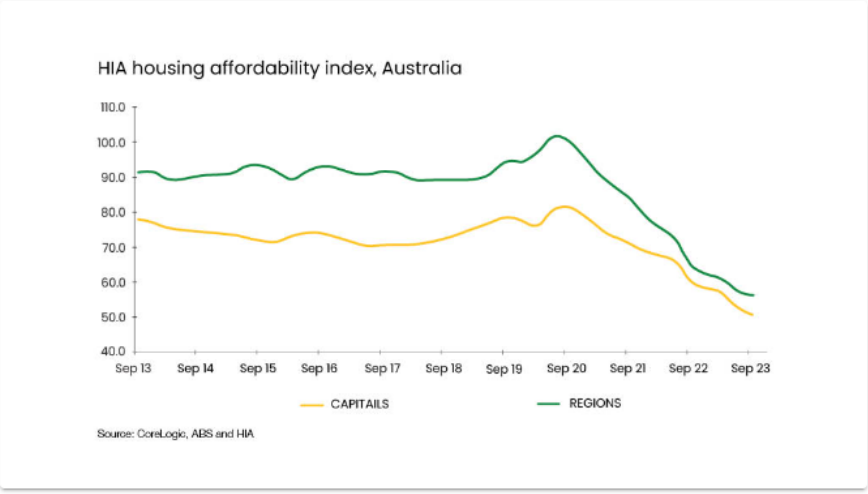
This theme examines the governance structure of the ABCB and how the ABCB Office works to support the ABCB in developing updates to the NCC. Considerations include the process around proposing and making changes, such as cadence of updates to the NCC, how advice is provided to Building Ministers, the role of industry in the update process, and stakeholder engagement to inform decision making.

Governance and gatekeeping

HIA strongly supports the ongoing role of the ABCB and the NCC, but this consultation provides a valuable opportunity to recalibrate how technical building regulation is developed, managed and administered and to address gaps in objectives.

There remain significant pressures which demand strong governance to navigate bureaucratic inertia, technical conservatism, or niche interests of industry, advocates, individual states or Departments.

The largest simultaneous amendment to the NCC progressed at a time when affordability and productivity are at sustained all-time lows.



Housing Affordability Index
Source: HIA

This occurred despite other reasonably achievable incremental changes showing potential to produce equal or higher benefits. In the view of the HIA, decision makers have at times failed to strike the right balance and weaknesses in governing obligations have allowed obvious supply and affordability challenges to be ignored.

Competition reforms of the 1990s coincided with the creation of the ABCB meant explicit obligations for best practice policy making were included in its governing agreement. ABCB via this IGA has a mandate to be a strong gatekeeper of regulation, and has previously operated in

that way. While this has had a clear influence on policy making and its effectiveness, the regulation burden on business has grown significantly overtime with an expansion of objectives the NCC caters to.

There have long been issues determining the appropriate level of stringency adopted on different issues, driven by limits on scope and the costs of intervention which can justify addressing the risk. In its review of building regulation, the Productivity Commission in 2004 noted, the ABCB's "objective 2 states that building requirements should be based on 'minimum least-cost' solutions."

The NCC is used as a vehicle for an increasing number of policies, yet some states and territories are delaying or varying national obligations suggests there has been a level of over ambition in some policies.
The Productivity Commission have again highlighted the issue in its 2025 research paper *Housing Productivity: Can We fix it?* pointing to updates to the NCC which have been implemented notwithstanding regulatory assessments estimating that they impose net costs on society.

A HIA member survey from February this year supports that this contributes to a systemic strain; 68% considered scaling back/closing because of red tape; 56% added admin/regulatory hours; 88% report increased stress.

However, the burden was accumulating for far longer. Since first BCA was produced the number of pages of the NCC alone is now 8.5 times longer (a 750% increase), the number of referenced documents has roughly doubled (from 81 to 169), while the number of defined terms has also risen from 64 to 363 in line with the number and scope of objectives the code deals with.

Outside of fire code reform initiatives of the 1990's, there has not been a holistic and coordinated effort for technical reform.

Without stronger enforcement of existing governance and a commitment across all levels of government, and specific aim to improve the regulatory environment, this burden is unlikely to abate.

The role of the ABCB Office

The ABCB supporting the Board in its decision-making functions code update and maintenance, undertaking research, consultation, regulatory impact assessment and stakeholder engagement and increasingly education.

Its role is essential to establishing the merits of issues, ensuring the right policy response is initiated, changes are communicated, governments and industry are supported. The capacity and capability of the Office has a strong influence on the suitability of outcomes.

Likewise, the Office serves an important function in distinguishing where technical and policy issues differ and where matters require more specialist input and procuring the advice. This can involve seeking technical advice from industry or committees which are established under the IGA, who provide technical advice to the Board.

This has led to some debate on its undertaking policy development on behalf of states and the Commonwealth, and how it presents industry's views where they differ in its advice to the Board. These issues will persist unless there are clearer roles are defined for the Board, the Office and others under the IGA.

Principles

HIA are supportive of the majority of the IGA's objectives and recitals but their impact has been blunted as the Board are increasingly relegated in decision making.

Limitations on the Board's decision making mean intervention to address an issue is a last resort where non-regulatory measures haven't been sufficient, and proportional standards are targeted so regulation does not go further than necessary.

Arguably, recent decisions have not met this test.

Nationally, the Office of Impact Assessment requires Standard setting bodies to consult and, inform their proposals using regulation impact analysis where appropriate. It is this oversight which is meant to ensure industry are given adequate opportunity to engage before the point of decision on new national proposals so requirements don't actively work against each other and have adequate explanation and clear objectives. Industry have at times failed to capture all issues before implementation, which is in part due to rate of change, and differing levels of engagement.

The current decision-making process does not require collective assessment of proposals, or issues like affordability impacts to be directly considered. Nor does it require these impacts be reduced or improved. This means even those proposals that don't fall short of best practice ideals can still each collectively impact supply and affordability.

The obligations on any government to consult and disclose the impacts is a key step to testing alternative approaches and central to evidence-based decision making, transparency and efficiency. Decision makers should request collective assessments, and issues such as affordability be an explicit and overarching consideration at the forefront of policy decisions. It

would provide a useful enhancement potential to improve the lives of home buyers and the industry through more supply and affordability of new housing.

New Australian housing is high performing by most international measures. Changes to the NCC have a marginal impact for the 2% of new or altered stock added each year. HIA contend the supply of more currently high performing housing has far larger benefits to all Australians.

There should be a refocused commitment on a holistic view of regulation changes in addition to individual changes, that they are only made in service of an explicit objective not to alter policy settings unless the evidence is clear and all trade-offs are considered.

Capability and funding

The ABCB funding model is fundamentally broken, inadequate in the context of our industry's output and value, reducing year on year in real terms as a result of an outdated agreement being extended.

Notes to the ABCB IGA state:

> *"A jurisdiction's contribution consists of a base component of $75,000 per annum and a pro rata amount based on the total value of building approvals in their respective jurisdiction. 2. For 2017-18 to 2018-19, contributions have been calculated using the Australian Bureau of Statistics (ABS) data for building approvals for 2012-13. 3. For 2019-20 to 2022-23, contributions have been calculated using the three year average of ABS data for building approvals for 2013-14 to 2015-16 inclusive."*

HIA question the suitability of assigning states contribution at a rate which is tied to building approvals as with stagnant or falling levels of construction there is less funding available to address the code's contribution to this problem.

ABCB's current Average Staffing Level (ASL) is unclear, but thought to have reduced to around half of its peak. Its operational budget, including corporate overheads and IT and may have been further impacted by MOG changes, which leaves less funding for genuine research and code development.

It may explain a retreat from servicing technical enquiries industry have experienced. Differing interpretations put them at risk of conflicting advice, due to limits of responsibility. However, states provide limited support which means the building industry are faced with delays or inconsistent interpretations across jurisdictions and local government areas. HIA question if interpretive issues are features of a well-developed code.

Maintaining an outdated funding model has diminished Office capacity and made it more reliant on funding from outside sources including proponents of changes, with their own legislative agendas.

If allowed to continue, this would have several implications, namely ABCB selectively fulfilling its required functions, more transient decision makers, inconsistent decision-making and more marginal proposals from niche or special interests.

Research

The rate of research in industry is low compared to other sectors and its overall output. The Productivity Commission noted in 2004 that "Without government or some other form of collective action, research into building techniques would tend to be too low, because of the difficulty in preventing other suppliers from copying new techniques without payment."

There is a also a regulatory chill from the volume and churn that discourages innovation. Government funding can therefore be used also to support research and technology that can lead to more efficient solutions not just to justify regulatory changes.

Value of industry's role

Industry via the HIA have been strong contributors to cooperative industry government model of governance. Industry contributes to standards and code development through proposals, committee representation, implementation, education and awareness as a source of support and advice and our networks provide feedback on implementation and supply issues.

ABCB has been a successful model of industry and government cooperation. The IGA recognises the value of including industry representatives with "capacity, experience and skill" to be involved in addressing issues in the built environment. Concerningly, there are currently 3 vacant industry positions on the Board which limits its opportunity for involvement.

The ABCB and relevant state government agencies responsible for building administration should fully support the development of industry agreed solutions in administration, the code or referenced Australian Standards or guidance.

Industry has been proactive and willing to engage, it has been frustrated by the progress of many initiatives referred to Senior Officials Group (SOG) including issues like aspiring to remove variations, inconsistent interpretations across jurisdictions and local government interventions.

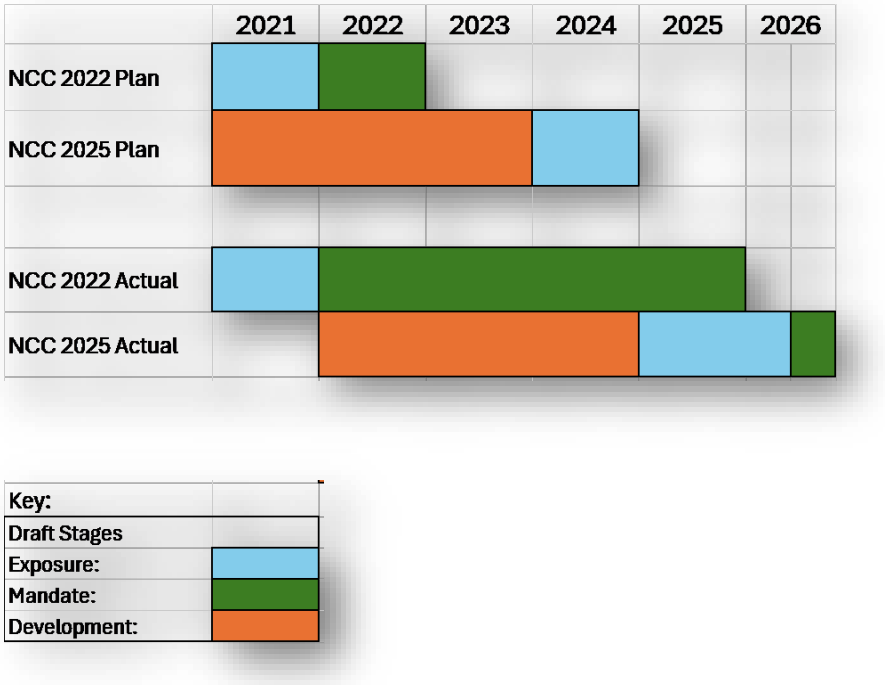
By participating in the whole system Industry plays an important role of joining up government Departments which otherwise can silo decision making and bring bounded rationality to their decisions.

Cadence and transition

HIA were a key supporter of moving from an annual amendment cycle to a 3-year code. Its intention was to ensure the industry had adequate time to adapt to new changes, educate and upskill, while for regulators it allowed for more development and research and consultation. While the three-year NCC cycle has slowed the tempo of change, it has resulted in proposals which are larger both larger in number and larger in stringency. This raises the stakes of regulatory failure, the degree of adaptation required by industry and for multiple changes to coincide in a single individual amendment.

This ambition then needs to be managed by states at implementation.

Variable adoption practices (including delayed or varied uptake) can create uneven and uncertain impacts for national participants. Recently while NCC 2022 was being adopted, there were overlapping parallel consultations and awareness raising on NCC 2025. States that are early adopters challenge industry's capacity to reskill and educate on changes.



NCC amendment cycle plan and actual
Source: HIA

HIA contend that two key issues need to be separately addressed by a longer amendment cycle.

The first is a lack of focus on implementation issues by states in code development. This has led to a level of ambition or stringency adopted in the NCC which is too optimistic for industry, and its supply chains to serve. For NCC 2022, it was only at implementation when state variations emerged for manufactured homes, narrow or difficult blocks or whole climate zone

exclusions application to renovations.

The second issue is, notwithstanding the impacts of adopting options that impose net costs justifiably leading to some states not adopting changes included in NCC 2022, the timing of and transition to significant changes.

Early adoption by some states has significant implications for supply chains, projects under foot, revising standard plans, training and education. Despite this being understood, each state brings its own approach and timing for each issue. Examples include energy efficiency in NCC 2022, Lead in Plumbing Products in 2026, where transitions had no regard for existing stock, enforcement issues or the availability of compliance tools.

In recognition not all issues can be foreseen, following the NCC publication, a period of exposure for voluntary adoption would surface issues and improvements prior to mandatory application (as is currently the case in WA). This along with an administrative system which allows for discretion in application reflects better practice in HIA's view.

Governance reforms

The ABCB to be established as a national independent statutory authority for the development of the national code and administrative provisions under a single Ministerial Council.

Appropriate powers and resources be provided to ensure the NCC is a single national code and reduce or remove inconsistent approaches by states and territories.

New frameworks that retain and reaffirm ABCB's gatekeeper role strengthening those in the current IGA which ensure predictable timing, industry cooperation, best practice principles of regulation and competition impacts are managed. This includes setting out:

- Clear and unambiguous objectives for the Board, bringing under its control other elements the system that influence the codes' implementation.
- Roles/responsibilities of the Board and the ABCB Office through a statement of expectations which establishes its focus and priorities on productivity enhancements and system efficiency and any other duties currently undertaken by SOG.
- Limits on decisions which recognise the role of alternatives like education, advice and directions.
- A 5-year amendment cycle with a 12-month voluntary adoption period for major amendments with longer exposure periods.
- A fixed annual administrative amendment (e.g., 1 May) for proposals that involve productivity enhancements, simplification, expansion of options and new standards updates.
- Appropriate funding for the development of the NCC and administrative provisions.

Provide adequate funding for the functions of the ABCB Office and its committees to undertake, develop new tools to deliver on the expectations in appropriate forms and adequate detail. This includes:

- Research, promoting voluntary better practices, adjudication and national advice

- Administration of new and existing tools with supporting functions such as those administered under NatHERS and bring closer governance of the building and plumbing catalogue of Standards Australia
- Adequate industry representation and expertise on domestic residential building and in advice to the Board and Ministers
- Integration with free standards and the NCC

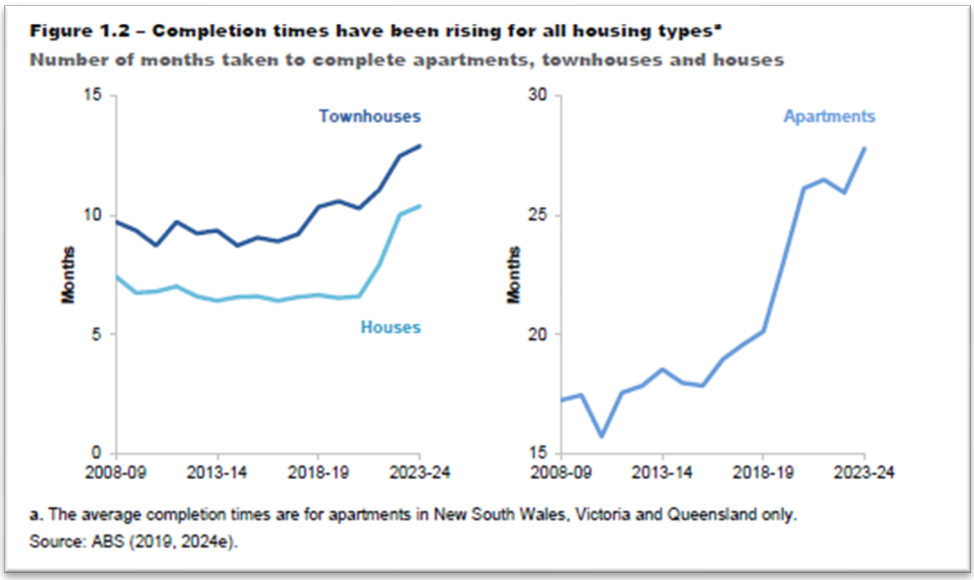
Provide integrated and free access to Standards referenced in the NCC.

Theme two: Complexity and regulatory burden

This theme examines the role and purpose of the NCC, including opportunities to reduce state and territory variations and consider the adoption of international standards and best practice. It will also investigate areas of duplication within the NCC and other building regulations, and how existing requirements and desired building outcomes can be achieved more easily and with less cost.

Regulatory burden

The residential building industry is one of the most heavily regulated sectors in the economy. This is manifesting itself in declining affordability and feasibility of projects and time spent in approval.

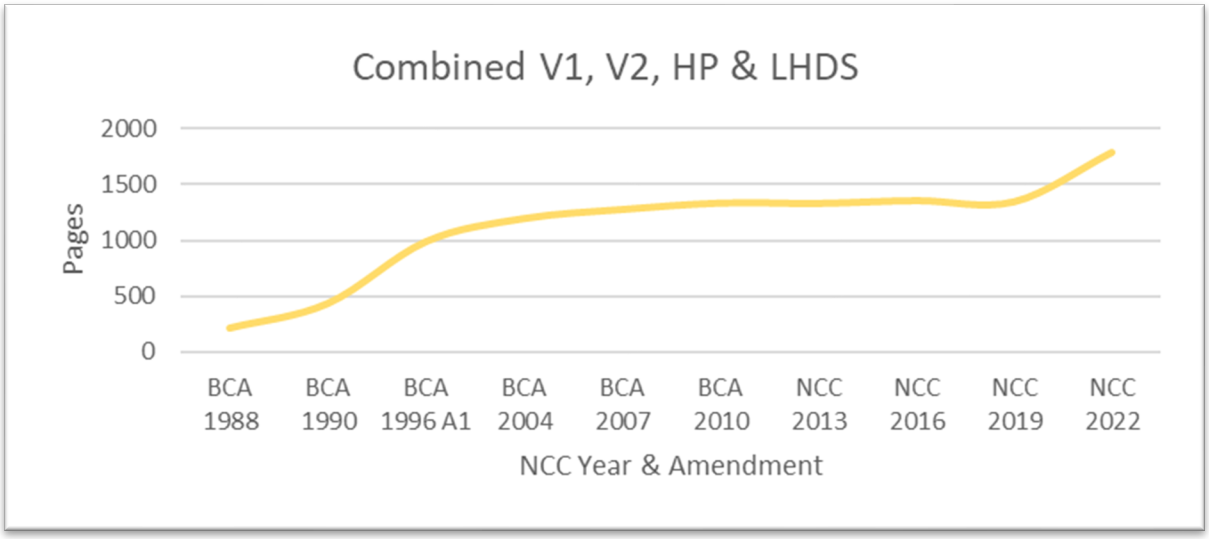


Completion times

Source: Productivity Commission (2025)

Individual changes at all levels of government are often seen as having a lower impact on affordability relative to other fluctuations (land costs and interest rate changes). However, the accumulation of marginal changes can be significant.

Growth in the NCC: The Building Code's page count has grown significantly since inception, reflecting the expansion of objectives and technical scope.



Growth in building regulation

Source: ABCB, HIA.

Notwithstanding progress which has been made in incorporating variations into the NCC, there has been a lack of commitment from states to a key principle of variation reduction.[2].

A recent HIA Small Business Conditions Survey asked the question of respondents what impact has recent changes to the National Construction Code had on your business? Thematic coding of responses suggests the changes were overwhelmingly perceived negative (63%), only 3% positive while the remainder were neutral[3].

Role in productivity

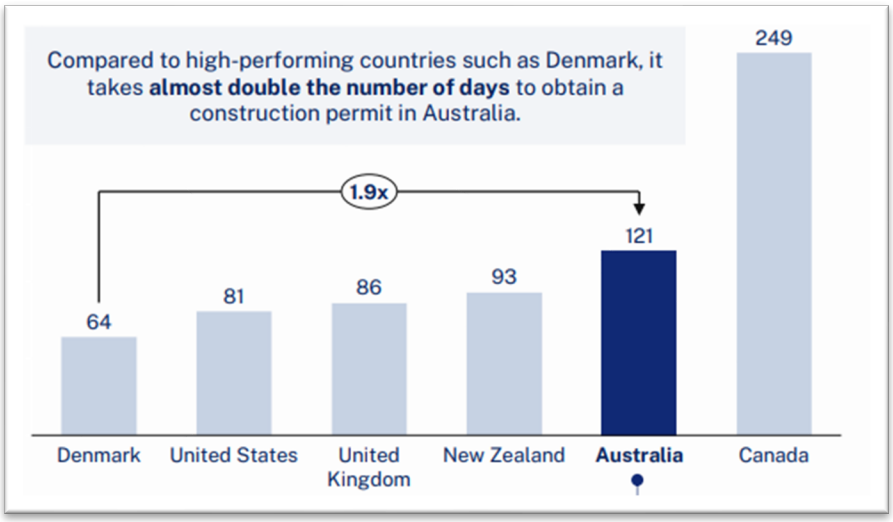
Homes built per hours worked are around 53% lower today compared to three decades ago.

The scope of the review does not consider several areas the Productivity Commission noted also make contributions to the issue. Planning remains a main area where slow and complex approvals (e.g., development approval times reaching over 150 days on average in NSW) weigh heavily on productivity.

However, it is difficult to separate regulatory burden when an accumulation of proposals with marginal efficiency—even when well-intentioned—has increased costs and discouraged new home supply.

[2] Based on HIA preliminary research found over 50 variations relevant to the NCC which sit outside in environmental planning policies, residential design codes, Ministerial Building Standards, Mandatory Provisions and Building Regulations of NSW, QLD, SA and Victoria alone.
[3] See https://hia.com.au/our-industry/advocacy/small-business-conditions-survey?srsltid=AfmBOooWVPixBAlLWxASvyf4cBJP0G1Yx5YHn1R_YGoKp0BnmkTS3J6G

A lack of coordination and consistency between three layers of government leads to more regulatory burden on industry.



Approval timeframes

Source: Mandala, Australian Institute of Company Directors (2025)

Even where well justified, the large volume of regulation makes the planning and development process unambiguously longer and more complex. The Productivity Commission (2025) calls out the raft of regulations not specifically related to housing including, environmental, which have increased significantly over the past 20-years having lead to high levels of uncertainty.

A large increase in objectives and regulation has made planning and development longer and more complex, involving more agencies and decision makers with distinct information needs.

Code improvements require whole of system support, with many variations and local government variations exist in contradiction to the principles like the gateway model and the variation reduction project.

Cumulative burden

Three notable change to the NCC have been assessed as imposing net costs on the community:

- 6 star energy efficiency: -$259 million NPV
- 7 star energy efficiency: -$547 million NPV
- Livable Housing Design Standard: -$3,127 billion NPV

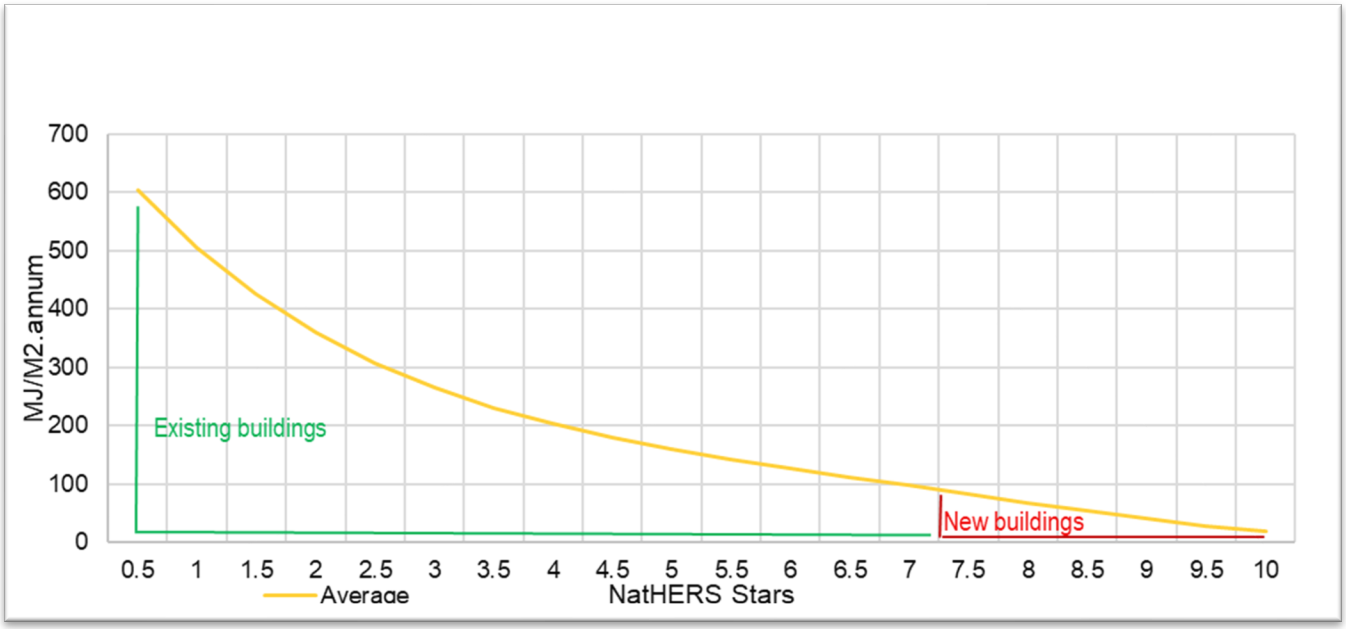
Two of the changes (7-star energy efficiency and Livable Housing Design Standard) were introduced in NCC 2022, are also excluded from the scope of the review. HIA dispute this is necessary given the decision of several states not to adopt a national policy.

Their assessment occurred as individual policy problems, not as an overall system change or cumulative impact. The counterfactuals were also limited by the range of responses available to the Board to address the issue. This resulted in siloed choices, failing to account for interactions, sequencing and timing or other more effective policy choices.

While regulation improves the built environment, sometimes in major ways, the benefits can accumulate over the very long run and in unseen ways such as through avoided fatalities or savings to health systems. For marginally beneficial changes—even when well-intentioned—can still carry large costs today.

Some costs are unmeasured including the extent this discouraged new home supply, committing many to older, more expensive, less efficient and less resilient homes than the code currently produces.

For example, existing homes with an average rating less than 3 stars in a capital city, use significantly more energy on average than that required under the current regulatory minimum. Emissions reduction potential is also vastly higher[4].



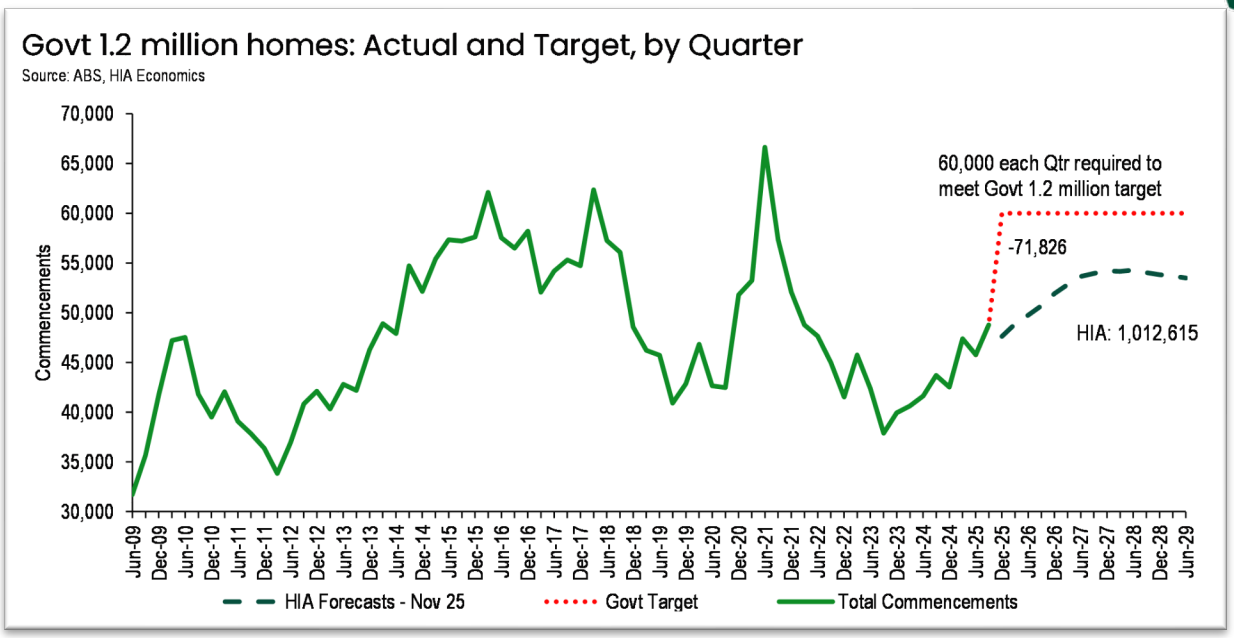
Average NatHERS Star Band Criteria - Capital cities

Source: NatHERS, HIA

While approvals are cyclic by nature, member feedback suggests that deterioration in market conditions including affordability has led to lower confidence. A draw forward in building

[4] NCC 2022 and NCC 2019 changes cumulatively abated approximately 8.1 MtCO2-e emissions over the life of the regulation of the 253 1 Mt $CO2\text{-}_e$ required to reduce Australia's emissions by 43% to 2030.

applications has been observed prior to implementation of previous NCC changes, which suggests many would actively forgoe supposed benefits[5].



Housing Commencements by Quater

Source: HIA

HIA's industry survey also signals the effect of complexity and drag of regulation:

- 53% spend 5+ hours/week on compliance (32% >10 hours);
- 56% spend added admin/regulatory hours;
- 68% contemplated scaling back or closing; and
- 73% do not expect to hire more staff next year.

There is no obligation for ABCB to consider impacts on affordability the impact on individual borrowing was considered for energy efficiency under NCC 2022.

The impact of the policy on supply was not assessed as significant. If it were, consideration other policies may have revealed more feasible alternatives for consideration.

Yet, limits on decision making and a handwaving approach to implementation can fail to account for interactions, sequencing and timing implications and frustrate attempts to achieve 1.2 million homes target.[6].

[5] See, https://hia.com.au/our-industry/newsroom/economic-research-and-forecasting/2024/06/regulatory-changes-distort-new-home-sales?srsltid=AfmBOorkCgja-Mo4dvLkxxcpFqCY3ZAs_GTIESivAAuUomi0J6XvKs7D

[6] While Australia are on track to fall short of the aspirational target of 1.2 million homes by around 20 percent, HIA believe the target should be more like 1.9 million to meet current demand https://hia.com.au/our-

Opportunities for simplification

Code improvements delivered through expansion of alternatives in the NCC, system administrative improvements, enforcement of the gateway model and variation minimisation[7].

Administrative measures:

- Reduce duplication and variations by committing to a measurable net reduction in state and territory variations
- Enhance the gateway model opposing local government interventions. Undertake a review instruments such as states Directors' Determinations for policy matters better placed in the NCC or removal subject to adequate assessment
- Streamline acceptance pathways for trusted international standards and comparable test methods to minimise re-testing and reduce delays and costs
- Enhance the product/system certification ecosystem including through clearer CodeMark guidance
- Establish a process for recognising widely used adopted systems or performance solutions utilising Product Technical Statements, or Technical Specifications.
- Enhance the approach taken to assessing impacts to have regard for efficiency of the whole system, affordability and the cumulative impacts and timing of changes.

Technical

- Review code content for simplification and compatibility with tools such as those which automate DTS compliance and compliance checking
- Prioritise existing proposals that expand alternatives already identified by industry, including the following in this submission:
    - Waterproofing wet areas & floor wastes (IDs 16, 17, 18; and program 55 to review Part 10.2)
    - Structural steel corrosion protection for internal, encased/lined members (ID 22)
    - Surface water drainage clarifications for monolithic alfresco/veranda slabs (ID 19)
    - Variation reduction (ID 48)
    - Condensation simplification for small roof projections (ID 27)
    - Digital NCC searchability and AU-only climate map (ID 53, 52)
    - Allowing alternatives (methods ID 2,3,5, 9 and targeted simplifications and alternatives 30).
    - Solutions for direct fix cladding in climate zones 6 and 7 (ID 56)

industry/newsroom/economic-research-and-forecasting/2025/11/a-shortfall-of-2-million-homes?srsltid=AfmBOooez4HntwxkR_EEufjnI7aApVFabOBzYV3LqoqX1KIgTcEjJd-I

[7] While some matters are likely to require reflecting in governance, they are grouped here due to their contribution to simplification

Theme three: Usability of the NCC

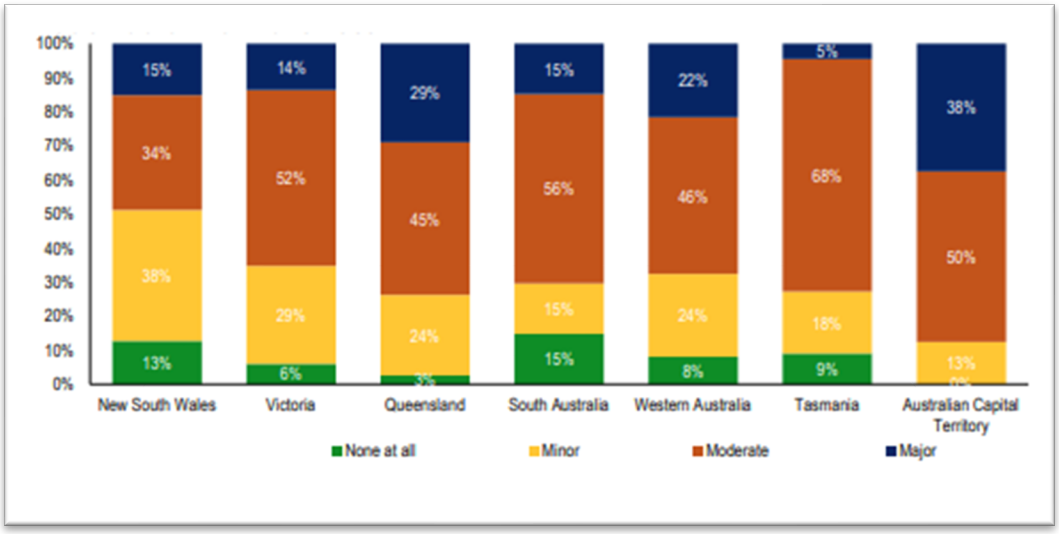
This theme examines how to make the NCC easier to understand, navigate and apply, without compromising building quality and safety. It will investigate opportunities that support productivity, innovation and compliance. This theme includes consideration of digital enablement, including AI use cases to improve usability and accessibility for tradies, businesses and households.

Usability and understanding:

Member feedback highlights that the code's length, wording (expression), structure and access model reduce usability and contribute to inconsistent interpretations and approvals. Conflicts and cross-references increase compliance risks.

The HIA 2026 Small Business Conditions Survey confirms some of the frustrations members feel in gaining a better appreciation of the NCC.

- 63% of respondents report a moderate to major business impact from recent NCC changes;
- only 58% feel confident they know all applicable requirements (22% not confident), reinforcing the need for clearer, more navigable provisions and accessible referenced standards.



NCC impact on business (State by state responses)

Source: HIA 2026 Small Business Conditions Survey

Consistent feedback suggests there is a poor level of understanding of the NCC content.

Usability / Navigation / Clarity of the NCC — was raised 24 times under one question:

- *"The hard copy Volumes are not easy to navigate… the 'code' system… is far more complicated than the previous system."*

- *"Clarity around certain sections of the NCC. Lack of understanding and knowledge from certifiers."*
- *"…confusion around whether some or all of the changes are applicable…"*
- *"The amount of time… navigating the NCC and NatHERS… constant changes and additional paperwork are a nightmare to follow."*
- *"Conflicting sections in the different volumes… being small, it is hard to keep abreast of all the changes and how we comply."*
- *"Spending time trying to understand what we can and can't do. Understanding the constant changes."*

Interpretation / Inconsistency between certifiers & states rated 18 mentions:

- *"Everyone's interpretation of the NCC is different. Some Certifiers make their own rules… It is very hard to keep up."*
- *"Different states may adopt the new code at different times, creating confusion and compliance risk."*
- *"Redesigning plans across multiple and uncoordinated States. It's a farce to call it National."*
- *"With extensions… Different surveyor, different interpretation… Frustration with system…"*
- *"Most certifiers do not know how to apply the code changes to simple and complex renovation projects."*

Core to many complaints, is expression and disjointed obligations (e.g., liveable housing interacting with weatherproofing, waterproofing or termite management).

The NCC's Housing Provisions are context dependent whereby building elements and products are subject to multiple obligations that can differ for key NCC objectives depending on context:

- Fire, it is proximity to boundaries and other buildings, Classification (end use), bushfire overlay, rise in storey to determine among other things resistance levels.
- Structure, topography wind loads Classification, importance level, materials and the way components are combined.
- Energy efficiency climate zone, orientation, floor area, new or existing buildings.
- Individual elements and like building control layers may need to satisfy several disparately located performance targets for issues like thermal (energy), combustibility (fire) and permeance (condensation) performance and can be subject to climate and state variations or building Classification considerations.

Code structure and consolidation efforts intended to enable machine reading and interoperability have stalled.

As a "builder's bible," the Housing Provisions are now long and complex, with multiple volumes, barriers to accessing standards and state/territory variations.

Known simplifications proposed by HIA have been resisted due to a perceived lack of urgency include consolidation of drainage to floor waste variations which increased following NCC 2022 changes and an emerging Classification issue with Specialist Disability Accommodation, HIA propose to treat with additional fire safety proposals.

Access

Availability of standards to the small businesses which need them plays a key role in compliance. Standards Australia have 167 referenced standards in the NCC, most would have no international equivalent which suggests we are more heavily reliant than other countries on access to standards for the solutions the code demands.

But obstacles persist to recognising other solutions and accessing Australian Standards. Australian Standards should be accessible at no cost or at no more than marginal cost, as has been general practice with all other Australian legislation.

Businesses are obliged to comply with all these standards. The flood of standards places a heavy compliance burden on builders and contractors. With the average cost of individual standards being well over a $100 each the ongoing costs of purchasing standards is a significant impost on the building industry, given that standards are continually updated and new versions becomes the new regulations that must be adhered to.

Feedback from the HIA industry survey reflects this sentiment:

- *"NCC should be available… FREE of charge."*
- *"…suppliers and tradespeople don't have the relevant information or products readily available to meet new standards."*
- *"As custom builders… access to information and ensuring we are across every change [is challenging]."*
- *"Changes to Australian Standards that need to purchase again."*
- *"Constantly having to re-check compliance… cost of obtaining booklets for compliance, trades people not keeping themselves informed due to costs to purchase NCC Books."*

Industry contributes the majority of the value to standards voluntarily, with roughly 60 committees relevant to the residential sectors it is reasonable to assume over 1,200 volunteers commit their time and intellectual property to documents industry then has to pay to access. This does not align with the fundamental principle of transparency and accessibility of legal requirements.

The *National Competition Policy Analysis 2025* report identifies significant productivity barriers and recommends government funded access to mandated standards which could unlock $1.9 – 3.8 billion in annual productivity gains from awareness of obligations, reduced compliance

risks from consistent application and enforcement, fewer defects and safety related incidents and more consistent regulatory interpretation.

The enthusiasm for 'best practice' standards sits uneasily with minimum effective regulation. It is contrary to Standards Australia's obligations under its Memorandum of Understanding (MOU) with the Commonwealth which requires the company to develop minimum effective solutions.

It also conflicts with the objective of the NCC to set minimum acceptable technical requirements for ensuring the health, safety, amenity and sustainability of new buildings.

Stringency and code content

The QLD Productivity Commission has been strident in recommending the standards adopted in QLD are minimum necessary[8]. This followed QLD decision to adopt both energy efficiency and liveable housing provisions introduced in NCC 2022.

Work underway with ABCB to simplify the elemental provisions of part 13 of NCC Housing Provisions, while welcome, will achieve fewer simplifications than if the current nominated stringency could be varied, even slightly.

To support HIA initiating an independent review of technical building regulation, HIA asked the members of our technical committees across the country to provide specific suggestions and insights into areas that could assist. Suggestions received included:

- Removing restrictive or redundant regulations, clauses, sections or standards that contribute little to outcomes
- Simplifying approval, planning or compliance checking, local variations which have made a difference and could be expanded elsewhere
- Adopting expansion of alternatives, new methods, innovative practices; alternatives which are not (but should be) recognised.

New solutions, new materials or new technology or innovative solutions area feature of many proposals received and are likely to bring other benefits such as enhanced competition.

Removal of code content is a feature in around half of all suggestions received and many identify stringency as its core complaint. A full list of member proposals can be found in **Attachment 1**.

Simplification and usability

The NCC's evolution from simple minimum criteria to more specific solutions has shifted the burden for demonstrating compliance onto more elements. Ambiguity in performance-based

[8] See, https://qpc.qld.gov.au/content/inquiries/construction-productivity.html

pathways, combined with rising regulatory stringency, inconsistent interpretation leaves industry with fewer quick deployable compliance options.

A cultural preference for readily identifiable compliance, more criteria and conservatism in decision-making will discourage innovation where it results in higher-than-necessary regulatory burden. Achieving both simplification usability will require, more reliable alternative pathways, and a regulatory framework that accommodates a wider range of practical construction solutions with clearer intent.

Traditionally, the residential industry has had a strong preference for prescriptive regulation. However, prescriptive solutions the code offers are inherently limited. As regulatory stringency increases prescriptive solutions become harder to achieve across the diversity of building types, sites and construction methods excluding safer, available lower-cost approaches.

Over-prescription limits the ability to tailor approaches to project conditions, restricts industry-led innovation, and contributes to unnecessary cost escalation. Frustration with performance-based uncertainty is also evident. When the simplest available compliance options fail to accommodate a reasonable range of real-world situations, practitioners are left with fewer workable alternatives under the administrative systems currently in place.

A recurring problem across both prescriptive and performance-based elements is the absence of clearly articulated “intent” statements. Without explicit descriptions of what a clause is trying to achieve, practitioners cannot confidently judge whether an alternative is suitable. This leads to risk-averse decisions, unnecessary conservatism, and frequent disputes about interpretation.

Code changes do not consider their application to existing buildings, yet more often states are using either adapted NCC clauses or additions to describe how renovations and unaffected parts of buildings must comply.

The role of tools

It is possible that previous efforts to expand alternatives in the NCC such as through the re-inclusion of DTS, have been incomplete adding complexity of decisions.

Therefore, new solutions/standards if recognised by the code will also add to its length and complexity, particularly where it tries to encompass alternatives in prescriptive detail.

The benefit of providing alternatives is likely to outweigh the costs of navigating them, it is suggested that technology solutions, like Large Language Models or Artificial Intelligence may improve a user’s experience and mitigate the downside of increasing the length and complexity of the document.

The majority of energy rating is now undertaken using Home Energy Rating Software, which is both more dynamic allowing trading between building elements to achieve the thermal rating targets and between regulated appliances to achieve whole of home energy targets.

Likewise, structural software interprets the limitations described in standards and provides a more efficient means of automating design using lightweight framing and roofing with proprietary connectors.

These tools were developed with concerted effort and enabled by protocols and Memorandum of Understanding and given recognition and status by the NCC.

Industry friendly interfaces and tools in other areas hold significant promise in other areas, like condensation management simplifying decisions. Likewise, for assessment and approval, compliance checking is an area where tools can play a role with adequate testing frameworks, development and endorsement.

Opportunities for usability

HIA recognise wholesale reform and restructure demand a long-term commitment, resourcing and multi-year projects and research.

HIA calls on Government to commit to a longer-term road map to deliver a restructured code.

Initial reforms focus on prioritising simple changes through the administrative amendment to recognise simplifications that expand alternatives, increase efficiency and productivity to provide additional flexibility without compromising the performance of other areas of the code.

- Deliver a Digital NCC which is searchable, structured, and linked to explanatory intent/background;
- Establish a Housing Codes Committee dedicated to Volume Two to expand Acceptable Construction Practices (ACPs), monitor ACPs/Standards relationships, recognise conventional practices.
- Providing industry free access to NCC referenced standards in coalition with industry and investigate robust plain-language models and integrate referenced standards.
- Enhance processes for the assessment and recognition of innovative systems, repeated Performance Solutions and the acceptance trusted international standards.
- Prioritise known conflicts and clarifications in DTS for:
    - Livable housing DPC/landing concessions at the entrance door; avoid blanket mandates for sanitary compartments on garage entry level; adopt AS 1428.1-style step ramp options (ID 34, 35, 36).
    - Internal waterproofing (Part 10.2) to clarify issues associated with unenclosed showers, insert baths, windows in showers, floor wastes, penetrations and waterstop heights. HIA floor waste proposals into DTS and incorporating the alternative Verification Method from Volume One into Volume Two (ID 55).

Medium term:

- Develop models for code interrogation, which simplify expression and allow interaction with content.
- Enhance tools and guidance which address known gaps and issue National Guidance where appropriate.

Theme four: Innovation and housing diversity

This theme examines removing barriers to the uptake of new materials or products, diverse housing models and the adoption of modern methods of construction (MMC), such as prefab and modular housing, which can be more cost effective and energy efficient.

Governance and innovation

Innovation plays a critical role in the productivity of the construction industry. Often our regulatory requirements are slow to adapt and can present roadblocks to the adoption of new and more innovative forms of construction. Add to this increasing regulatory obligations on manufacturers and suppliers which are creating an environment that is hindering greater productivity and innovation from this key sector.

The use of innovative systems has long been a challenge incompatible with prescriptive solutions that has been treated by the performance-based structure. Some notable systems that have only recently gained DTS acceptance in the NCC include:

- The use of Photovoltaic systems for onsite power generation
- Truss and frame engineering
- Exterior Insulation Finish Systems for cladding.
- Photoelectric exit signs
- Structural insulated panel systems.

The Performance Solution process has been enhanced over time to require a dedicated and more detailed understanding of the suitability of solutions under recent work by the ABCB to ensure its competent use.

Currently, Performance Solutions and evidence of suitability introduce regulatory uncertainty that can discourage all but the most well-resourced and ambitious innovators.

Feedback to HIA from industry indicates consumers often perceive performance solutions as a way of avoiding code rules and treat its proponents with suspicion making it less desirable as an approval pathway. Frustratingly, for repeated solutions this brings more regulatory burden, risk of inconsistency in interpretation and acceptance at approval, higher costs, and potential incompatibility with other DTS obligations.

Recognition of innovative systems in the NCC has not been the result of a responsive amendment process or deliberate effort. This is despite where more efficient solutions exist, facilitating acceptance is one of the core goals of the Board, who in addressing issues must ensure there is no regulatory or non-regulatory alternative that would generate higher benefits.

While builders as agents manage approval of projects, manufacturers have a role to play in meeting the evidentiary requirements. Industry and manufacturers as proponents looking to

achieve greater acceptance through the code, are seen as having an interest as distinct from policy makers when furthering their policy aims.

The current approach constrains the promulgation of innovative and more efficient solutions to those with resources, patience and an understanding of the regulatory change process .

MMC

HIA have identified prescriptive and linear DTS provisions assume conventional materials, techniques and sequences, making it difficult for Modern Methods of Construction (MMC)—such as prefab, modular and 3D printing—to fit within standard pathways.

National Competition policy objectives have identified MMC as the collective responsibility of the ABCB and states and territories. These deliverables are outlined in the NCP Federation Funding Agreement under a reform to lower barriers to modern methods of construction. States, including Victoria are considering amendments to their regulatory systems aimed at ensuing harmonisation with nationally a Voluntary National Manufacturers Certification Scheme (VMCS) for modular and prefabricated buildings.

While a VMCS attempts to allow for more innovation and streamline assessment it will not encourage more uptake, more innovative systems or alleviate issues which require justification onsite.

The role of changing stringency

High local stringency and variations create fragmented acceptance regime and limit all forms of construction and particularly MMC scalability and deployability.

Stringency settings approaching best practice can unintentionally reduce the scope of known solutions available to exceed minimums without costly trade-offs elsewhere (e.g. impacts attributed by industry to the 7-star uplift ranges from smaller windows, excluding flooring systems and restrictions in colors to whole blocks being unsuitable for some forms of construction).

The Productivity Commission (2025) recognised product innovation can be slow to respond and hampered by regulatory ‘chilling effect’ from ever changing stringency.

Notwithstanding the inefficiency of some stringency settings adopted, it is the lack of alternatives which are readily accepted which forces trade-offs. The antidote is to include more recognised alternatives, initially as prescriptive solutions.

A lack of alternatives

Governments are often too eager to make new rules rather than to what extent we can rely on international standards and larger markets as a signal for where new interventions are needed.

Different standards and regulatory thresholds can be perceived as a threat to safety and incumbents can favour the current system. Competition motivations can be difficult to distinguish from technical objections and demand persistent government involvement that many regulators lack.

International suppliers have argued the duplication of verification of suitability (physical retesting or procuring opinions to local standards) for 'equivalent standards' are subject to Performance Solutions. Conceptually, if this were to be overcome earlier by the system, industry could choose from the most efficient solution for each project, flow onto reductions in cost of products, more competition and ultimately more housing. Such a change would need to be supported with rigorous reporting frameworks.

There are examples of how given the right incentives, code writers can encourage international suppliers to participate in overseas markets.

- New Zealand allows the acceptance of products alongside New Zealand equivalents for 130 product standards (including US, European and other international standards) for plasterboard, cladding and insulation.
- Singapore provides set of criteria to which a recognised standard must satisfy. The ACCC recently published a similar set of criteria for acceptance of product safety standards.
- The EU's CE marking system which facilitates cross-border trade through harmonised product standards and New Zealand's Closer Economic Relations Agreement which demonstrates effective bilateral standard alignment.

Several member's proposals HIA received include expansion of alternatives at (See **Attachment 1**).

Opportunities for innovation

Given the drag on productivity existing and potentially new approval processes pose, reforms should in parallel seek to streamline regulatory processes for both MMC and innovative systems for conventional and offsite construction. In this regard we encourage participation in a national process, led by ABCB to expand the work on MMC on certification to consider how consistent approval can be managed.

HIA seeks streamlined pathways for performance solutions and acceptance of alternative products that already satisfy trusted international standards.

HIA recommend that a national industry taskforce further investigate the level of certification and verification required, particularly the supply chain roles and responsibilities and the inter-relationship with inspection and product certification.

Review the code to establish a uniform and reasonably achievable minimum standard would allow superior outcomes in aggregate.

- Provide as a pathway for endorsement and recognition of generic repeated Performance Solutions as an extension of the work currently underway on the Voluntary Manufacturers Certification Scheme.
- Streamline the acceptance of international testing standards and other systems Utilise Product Technical Statements.
- Simplify the consideration of Performance Solutions in low-risk settings such as Class 1a buildings (Major Project IDs 3, 5, 8, 9).

Develop new DTS for:

- Pedestal floor systems in time for NCC 2025 adoption, addressing tie-down for wind and membrane interactions, while ensuring it remains an optional pathway (ID 24).
- Create DTS for flexible plumbing connections in reactive soils (ID 29).
- Support diverse housing models by progressing the HIA Class 1c SDA accommodation proposal (ID 0) to provide clarity, safety and home-like outcomes at lower cost.
- Simplify the Housing Provisions Part 13 elemental provisions and expand NatHERS product library and scope for renovations and to cater to small/relocatable homes.
- Adopt holistic approaches to 7-star/WoH verification (ID 39).

Attachment 1: Member suggestions and priority

Row Labels	HP	LP	MP	QW	Grand Total
ABCB Climate Zone Map				1	1
ABCB guide			1		1
Condensation management	3		1		4
Dampproof course and weepholes		1			1
Digital NCC				1	1
Duplication across standards and Jurisdictions	1				1
Energy efficiency		1	1		2
Flexible plumbing connection in reactive soils			1		1
Gas meter installations			1		1
Guide to Standards and Tolerances			1		1
Handrails		1			1
Livable Housing Design Standard	2	1	2	2	7
Local Government intervention	1		3		4
NCC Volume Two and the Housing Provisions	2	1	4	1	8
Pedestal floor systems	1				1
Performance Solutions		1	1		2
Protection work process	1				1
Structural steel corrosion protection	1				1
Surface water		1		1	2
Upgrade of existing building			1		1
Variations	1		1		2
Waterproofing wet areas	2	1	2	1	6
Grand Total	**15**	**8**	**19**	**7**	**50**

MP=Major Project, QW= Quick Win, HP= High Priority

Category	ID	High Priorities	Preliminary Assessment
Remove Bans	**0**	HIA proposal for Class 1c use of SDA Accommodation The proposal for a new Class (e.g. 1c) has potential to deliver simplifications from the status quo. For industry it would provide more certainty in application of the code, appropriate levels of safety, improved home like environment and expanding the number and type of dwellings at lower cost suitable for SDA accommodation.	Simplification and housing diversity. (prioritisation of existing proposals).
Waterproofing wet areas	**16**	HIA proposals for Floor waste, (e.g. state variation as DtS, Volume One as VM in Volume Two and Floor waste extension in AS 3500.2).	Simplification, usability. existing proposal.
Waterproofing wet areas	**17**	Remove the maximum 1:50 fall requirement.	Simplification, usability.
Waterproofing wet areas	**18**	Remove the requirements in bathroom area, laundry and WC to provide a fall to non-required floor wastes.	Simplification. Savings are significant.
Variations	**48**	Variation Reduction. E.g. Director's determinations. These determinations provide additional building requirements above and beyond that required by the NCC. Determinations should be used as a method of clarifying the intent of a regulation or NCC clause. However, some also include policy matters which should be addressed in legislation.	Simplification. Likely to be similar in other states.
Structural steel corrosion protection	**22**	The Housing Provisions only refer to steel members built into masonry not requiring corrosion protection. The steel members located internally in the building and encased / lined should not need corrosion protection.	Simplification, usability, restoring alternatives.
Protection work process	**47**	The protection works process is cumbersome and needs reviewing, identifying the adjoining owner and serving of notices is frustrating , then waiting for up to 14 days for comment from adjoining owner who can delay the process by constantly asking for further information (there is no limit to this).	This would require changes to the building regulations.

Category	ID	High Priorities	Preliminary Assessment
Livable housing	**35**	An information note says the DPC must be above the external finished surface. This would put the DPC above the Floor level of the dwelling which is inconsistent with Part 5 of HP. There needs to be some	Usability. Increases compliance alternatives.
Livable housing	**36**	Resolve requiring the sanitary compartment in a garage on the ground floor/entry level. Allow alternative, but no mandate as some state variations like QLD provide for.	Simplification. Significant savings and no loss in amenity.
Duplication across standards and Jurisdictions	**11**	NCC references Australian Standards that then are duplicated or conflict with state/territory regulations or local planning requirements. Cut red tape by removing referencing standards in	Gateway model.
Pedestal floor systems	**24**	DtS or an Australian standard required for installation of pedestal floor systems. Removes NCC 2025 waterproofing uncertainty is adopted and should address tie-down for wind and membrane interactions.	Usability. Expansion of alternatives.

Category	ID number	Quick Wins	Preliminary Assessment
Livable housing	**34**	DtS provision resolve how to address termite management, weep holes, DPC, and drainage issues created by access. Notes referring to clauses in an Australian standard is not suitable for a single use document.	Usability.
Condensation management	**27**	For small roof projections (10m2).	Simplification.
ABCB Climate Zone Map	**52**	ABCB interactive climate zone map should be limited to Australian climate zones.	Simplification.
Digital NCC	**53**	Digital NCC should be searchable to enable clauses and parts to be easier to navigate and find information	Simplification to improve
Surface water	**19**	Surface water drainage requirements (3.3.3 of the HPS) could be extended to a veranda, patio or alfresco slab which is monolithic with the house slab.	Simplification, expansion of alternatives.

Category	ID number	Major Projects	Preliminary Assessment
NCC Volume Two and the Housing provisions	**2**	NCC to be updated to include common construction systems now in use (See 3 and 9). For example, AS 3600 as a method to achieve waterproofing in NCC Volume One and EIFS as a direct fix solution.	Usability, expansion of alternatives.
NCC Volume Two and the Housing provisions	**3**	NCC Part 7.5 is limited in cladding types to fibre cement and hardboard cladding, for 6mm fibre cement and 9.5mm hardboard and the fixing centres are at 100mm centres along the stud. A product technical statement that clearly showed compliance satisfies the performance requirement H1P1 and DtS H1D7(4) (See 2 and 9).	Innovation, expansion of alternatives.
NCC Volume Two and the Housing provisions	**5**	NCC Volumes have become overly prescriptive - making it harder for builders and certifiers to apply practical, cost-effective solutions.	Innovation and Usability.
NCC Volume Two and the Housing provisions	**8**	NCC referenced Standards free or create more detailed DtS in the housing provisions so reliance on Standards is not necessary.	Simplification and Usability. High impact increases compliance.
Performance Solutions	**9**	Need simplification of the performance solution process for common innovative building products. (See 2 and 3).	Usability and Innovation.
Flexible plumbing connection in reactive soils	**29**	Flexible plumbing connections in reactive soils are required to be installed to satisfy the requirements of AS 2870, however some jurisdictions are requiring a performance solution. A DtS provision needs to be developed to address this situation.	Governance. simplification (prioritisation of existing proposals). Expansion of alternatives
Liveable housing	**30**	Remove Livable Housing Provisions. Amend subclause 4 of H8D2 to not require all the other ABCB housing provisions to be complied with.	Simplification.
Liveable housing	**32**	Provide tolerance in meeting the Liveable Housing Standard for clearance dimensions.	Governance and usability
Gas meter installations	**37**	There needs to be set guidelines for the gas meter installer to comply with that are enforceable.	Governance

Category	ID number	Major Projects	Preliminary Assessment
Energy efficiency	**39**	Simplify the elemental energy efficiency requirements in Part 13.	Simplification, and innovation.
Local Government intervention	**43**	Streamline or eliminate DA (planning) referrals for low-risk developments (e.g. pergolas, small extensions), particularly where these are already regulated under state building Regulations or national codes.	Gateway model.
Local Government intervention	**44**	There's a clear lack of coordination between planning overlays and building compliance. Builders are stuck in the middle trying to meet two systems that don't talk to each other and are inconsistent	Gateway model.
Local Government intervention	**45**	The building regulations allow for dispensations via report and consent from Council (MBS). Where more than one R & C is required on a particular site the MDS (council) is requiring individual application applications and fees for when more than one dispensation being sought.	Governance.
Upgrade of existing building	**46**	Existing building should be exempt of being upgraded to new provisions when alterations are being considered. In a number of jurisdictions these upgrade provisions where introduced for class 2-9 building to ensure fire safety and egress provisions were being maintained and not compromised. Consider amendments to regulations to exclude Class 1 & 10 and SOU of Class 2 & 3	Simplification. Governance.
Variations	**49**	Remove determinations that are poorly written and there has been no support from the regulator in education industry when the determinations are gazetted.	Governance. Variation reduction.
Guide to Standards and Tolerances	**50**	There needs to be a national guide to standards and tolerance for consistency across all States and Territories.	Governance.
Waterproofing wet areas	**51**	Seek commitment to a variation reduction project adoption of more efficient solutions (floor wastes priority).	Governance variation reduction.

Category	ID number	Major Projects	Preliminary Assessment
ABCB guide	**54**	ABCB guide to the NCC needs to be revisited to clearly indicate the intent of the clauses so there is a greater understanding across the industry.	Usability
Waterproofing wet areas	**55**	New working group required to review Part 10.2 particularly DTS pathways for unenclosed showers	Usability.
Condensation Management	**56**	Invest in developing direct fix solutions for Climate Zones 6 & 7.	Usability.

About the Housing Industry Association

The Housing Industry Association (HIA) is Australia's only national industry association representing the interests of the residential building industry, including new home builders, renovators, trade contractors, land developers, related building professionals, and suppliers and manufacturers of building products.

As the voice of the industry, HIA represents some 60,000 member businesses throughout Australia. The residential building industry includes land development, detached home construction, home renovations, low/medium-density housing, high-rise apartment buildings and building product manufacturing.

HIA members comprise a diversity of residential builders, including the Housing 100 volume builders, small to medium builders and renovators, residential developers, trade contractors, major building product manufacturers and suppliers and consultants to the industry. HIA members construct over 85 per cent of the nation's new building stock.

HIA exists to service the businesses it represents, lobby for the best possible business environment for the building industry and to encourage a responsible and quality driven, affordable residential building development industry. HIA's mission is to:

> *"promote policies and provide services which enhance our members' business practices, products and profitability, consistent with the highest standards of professional and commercial conduct."*

The residential building industry is one of Australia's most dynamic, innovative and efficient service industries and is a key driver of the Australian economy. The residential building industry has a wide reach into manufacturing, supply, and retail sectors.

The aggregate residential industry contribution to the Australian economy is over $150 billion per annum, with over one million employees in building and construction, tens of thousands of small businesses, and over 200,000 sub-contractors reliant on the industry for their livelihood.

HIA develops and advocates policy on behalf of members to further advance new home building and renovating, enabling members to provide affordable and appropriate housing to the growing Australian population. New policy is generated through a grassroots process that starts with local and regional committees before progressing to the National Policy Congress by which time it has passed through almost 1,000 sets of hands.

Policy development is supported by an ongoing process of collecting and analysing data, forecasting, and providing industry data and insights for members, the general public and on a contract basis. The association operates offices in 22 centres around the nation providing a wide range of advocacy, business support including services and products to members, technical and compliance advice, training services, contracts and stationery, industry awards for excellence, and member only discounts on goods and services.