

15 July, 2010 issue date

SENATE INQUIRY – ENERGY EFFICIENT HOMES PACKAGE (HOME INSULATION PROGRAM)

SENATE INQUIRY – MAIN PAGE & FULL REPORT:

http://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Environment_and_Communications/Completed_inquiries/2008-10/eehp/report/index

Inquiry Recommendations 6-11:

http://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Environment_and_Communications/Completed_inquiries/2008-10/eehp/report/b01

Advises for changes to Standards Australia, Energy Efficiency Provisions in Building Code of Australia and call for research to identify different insulations for different climates.

Submissions received by the Committee:

http://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Environment_and_Communications/Completed%20inquiries/2008-10/eehp/submissions

- 15. Wren Industries (Tim Renouf & Secretary AFIA)
- 17. Dr. Richard Aynsley (Building Energetics)
- 23. Aluminium Foil Insulation Assoc – AFIA (Brian Tikey – President AFIA)
- 25. Amalgamated Metal Industries (Michel Bostrom & Vice President AFIA)

Public Hearings and transcripts DAY 1 – 17 Feb 2010 * Tim Renouf oral transcript

<http://parlinfo.aph.gov.au/parlInfo/search/display/display.w3p;query=Id%3A%22committees%2Fcommsen%2F12816%2F0006%22>

Prime focus on R-value differences for foil and bulk insulations

Recommendations

Recommendation 1

2.70 That a Royal Commission be held into the Home Insulation Program to investigate the development and implementation of the Program, including:

- gross and systematic failures in the development and implementation of the Program;
- planning and design of the Program, particularly the extent of consideration given to it by relevant ministers and senior executives;
- the safety and fire risks resulting from the installation of insulation under the Program;
- the adequacy of ministerial and senior executive oversight and responsiveness to advice given or developments in implementation;
- the loss of life and injuries to untrained workers contracted under the Program;
- given the haste, scale, unprecedented and other circumstances of the implementation of this Program:
- the adequacy of industry product standards and workplace training;
- the complete failure of workplace training;
- the extent to which pressures to deliver the Program as an immediate economic stimulus measure were expressed or implied, by whom and how they impacted appropriate program development and delivery; and the warnings received within or by the government in the months leading up to and following the implementation of the Program.

Recommendation 2

4.43 The government must inspect every home which had insulation installed under the Home Insulation Program for fire and safety risks.

Recommendation 3

4.45 The government's safety checks under the Home Insulation Safety Program and the Foil Insulation Safety Program must ensure that any shortcomings in relation to product quality or installation standards are rectified.

Recommendation 4

4.46 The government should put in place a mechanism to check work undertaken through the Foil Insulation Safety Program and the Home Insulation Safety Program to ensure that all safety standards and requirements are adhered to.

Recommendation 5

4.63 The government must pursue, finalise and publicly account for every case of fraud under the Home Insulation Program.

Recommendation 6

5.23 The government should establish a dedicated and industry-independent program to research insulation systems and help develop efficient and effective insulation policy.

Recommendation 7

5.28 That Standards Australia consider amending its funding mechanism so as to disallow contributions from any stakeholders with a potential commercial interest in any Australian Standard.

Recommendation 8

5.30 That Standards Australia consider reconfiguring its technical committee arrangements to prevent commercial interests from being seen to unduly dominate decisions which should be based on scientific evidence.

Recommendation 9

5.32 Standards Australia consider responding publicly and in detail to the scientific criticisms of AS/NZS 4859.1, and if necessary undertake an independent review of the standard.

Recommendation 10

5.49 The Australian Building Codes Board should consider:

- making public the submissions received during the consultation on the recent changes to the energy efficiency requirements of the Building Code of Australia;
- responding publicly and in detail to the concerns raised in this inquiry, and any related issues raised in submissions to the recent consultation, about the treatment of insulation in the energy efficiency requirements of the Building Code of Australia; and
- explaining the basis upon which BCA has not adopted suggestions that roof/ceiling R-value standards in the BCA (volume 2, table 3.12.1.1a) should include, in warm climate zones, maximum up values for naturally ventilated houses as well as minimum down values.

Recommendation 11

6.26 That the Government form a small advisory group, representative of all of the different components of the insulation industry, to:

- develop and consider policies or measures necessary to maintain a viable insulation industry in Australia;
 - consider policies or measures to maximise the energy efficiency for Australia's building stock in safe and measured ways;
 - proceed with the necessary research and changes to standards required to provide clarity around the efficiency of different forms of insulation for different climates; and review industry standards and workplace practices to ensure high quality standards across all jurisdictions and rebuild public confidence in the sector.
-



AUSTRALIAN SENATE
SENATE ENVIRONMENT, COMMUNICATIONS AND THE ARTS REFERENCES
COMMITTEE

Inquiry into Energy Efficient Homes Package

PUBLIC HEARING

Wednesday 17 February 2010

**Flagstaff 1 meeting room, Radisson on Flagstaff Hotel
380 William St, MELBOURNE**

| time | witness |
|-------------|---|
| 10.00-10.45 | Australian Cellulose Insulation Manufacturers Association (submission 8) Mr Andrew Arblaster, President Polyester Insulation Manufacturers Association of Australia (submission 11) Mr Jim Liaskos (United Bonded P/L) Mr Tino Zuzul (Martini Industries P/L) |
| 10.45-11.30 | Dr Richard Aynsley (submission 17) |
| 11.30-11.45 | break |
| 11.45-12.15 | Aluminium Foil Insulation Association (submission 23) Mr Brian Tikey, President (by teleconference) |
| 12.15-12.45 | Amalgamated Metal Industries (submission 25) Mr Michel Bostrom, Managing Director |
| 12.45-1.30 | lunch |
| 1.30-2.30 | Insulation Council of Australia and New Zealand (submission 18) Mr Dennis Darcy, CEO +TBA |
| 2.30-3.00 | Wren Industries (submission 15) Mr Tim Renouf |
| 3.00-3.45 | Standards Australia (submission 26) Ms Kareen Riley-Takos, Relationships Manager |
| 3.45-4.30 | Australian Conservation Foundation and ACOSS (submission 6) Ms Monica Richter, ACF Sustainable Australia Program Manager (by teleconference) Mr Tony Westmore, ACOSS (by teleconference) Tenants Union of Victoria (submission 13) |

committee secretariat: 02 6277 3526

venue: 03 9322 8198

SENATE INQUIRY: ENERGY EFFICIENT HOMES PACKAGE

PERSONAL SUBMISSION

18 Dec 2009

Tim Renouf (Affil. AIRAH - Aust' Airconditioning&Heating Inc.)
Wren Industries P/L
139 Herald St, Cheltenham VIC 3192
*Manufacturers - Concertina FOIL BATTTS(Product Certified) & RENSHADE
tel: 03 9532-5855 fax: 03 9532-5854 1800-066002
www.concertinafoilbatts.com info@concertinafoilbatts.com
*Secretary AFIA - Aluminium Foil Insulation Assoc. Inc.(Vic1998)
www.afia.com.au

The fibreglass insulation industry should attend the Home Insulation Program(HIP)Senate Inquiry and answer the question of why their products (eg PINK BATTTS) are not tested for high temperature radiation such as 50-70degC, temperatures as found typically in Australian roof spaces.

Bulk fibrous insulations have a "standardised" **material R-value** (resistance to the flow of heat) measured in a *steady-state Heat Flow Meter*(USA test methodology) between hot and cold contact plates set at 33 & 13 degC, where the mean (average) temperature is 23 deg. **ie $33+13 = 46 \div 2 = 23$ degC. The duration of the test is four hours. If the material thickness is doubled, then the R-value is doubled.

It is an established scientific fact that when mean(average) temperature increases for any insulation , the resistance (R-value) falls. But in reality, all insulations have *variable* Rvalues – claimed *guaranteed Rvalues* for bulk insulations are only valid for the standardized test conditions (33/13degC).

The HIP calls up the Insulation Standard AS/NZS 4859.1 which requires the assessment of radiant energy, but permits fibrous batt insulations to be labelled at 23 degC, a grossly inadequate testing condition for much of Australia's hot climates. The central problem is that no testing facility exists in Australia for realistic thermal measurement for both cold and hot climates. to happen. The Standard is contradictory and needs revision.

The federal government should not have rushed into the Home Insulation Program without consulting the insulation industry more widely. Adopting Material R-values for Climate Zones 1&2 (northern Australia and coastal QLD extending down to Port Macquarie) permits the use of R3.0 fibreglass PINK BATTTS. If the batts are tested at only 33degC, then what will the government say when complaints come in saying that the insulation is making the house hotter?

In summary, a Court case will eventually be brought against some agency that a fixed static Material R-value for any bulk insulation will be found to be actionable under Trade Practices for deceptive advertising. The government should face its responsibilities and deal with this issue now.

Australian 16/12/09 pg 2: "Third of power costs rise due to CPRS" Electricity bills in NSW estimated to rise over 3 years 44-62%. Reducing greenhouse gas emissions requires the reduced air-conditioning which causes peak load demand. Unless insulation materials can actually achieve lower cooling costs(by proven in-situ test programs, not computer programs), then tax-payers money is wasted and very likely the Home Insulation Program will be counter-productive in making houses hotter in summer.

On the other hand, aluminium foil insulations permanently resist radiation by approx 97%.

A small proportion of the \$4.6 billion approved for the Program should have been allocated to determine what insulation materials are best suited to hot climates.

In the public and national interest, the Senate Inquiry should demand to know why all insulation products are not tested for realistic high temperature effects.

END

Attention: The Secretary
 Senate Inquiry: Energy Efficient Homes Package (Home Insulation Program)

SUPPLEMENTARY SUBMISSION

Connection between R-values in Home Insulation Program & Building Code of Australia

I am the Managing Director of Wren Industries, manufacturer of CONCERTINA FOIL BATTS insulations. I have provided written and oral testimonies to the Senate Inquiry - Energy Efficient Homes Package (also known as HIP - Home Insulation Program) on 17 Feb: refer Submission 15 and Questions On Notice 12.
http://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Environment_and_Communications/Completed%20inquiries/2008-10/eehp/submissions

The following reference documents are provided to the Senate Inquiry as additional, important and very much in the national and consumer interest for best practice in Building Energy Efficiency for the reduction of Australia's Green House Gas Emissions. The comments below make frequent mention of the Building Code of Australia (BCA). The BCA and HIP have close linkage and a case exists to challenge - in both BCA and HIP - the regulatory levels of thermal insulation, direction of heat flow, and failings in the Australian-NZ Insulation Standard AS/NZS-4859.1.

CSIRO – Division of Building Research – Highett (Melbourne) VIC *3 documents

CSIRO-NSB 163(Notes on the Science of Buildings) “Thermal Insulation – Installation & Materials” (1991)

Pg 2 “AMOUNT OF INSULATION” Sections 7.01, 7.02, 7.03

Quote: “For Australia’s temperate coastal regions, insulation (for ceilings) with a thermal resistance of **R values of 1.5 to R2.0** would be generally adequate”

CSIRO Sheet 10-20 “Insulating Your Ceiling”(1981)

Refer: “HOW MUCH SHOULD I USE?”

Quote: “For batts and loose fill (insulation) this Division suggests using an amount that will provide a thermal resistance of **R2.0**. This recommendation can be justified on economic grounds after consideration of several factors such as future fuel costs, interest rates and marketing factors”.

CSIRO – Rebuild (June 1981)

Page 4 * this is part of an unsighted CSIRO periodical – one page only revealed.

Quote: “Insulation rated R2 will reduce the heating load by about 30%. **Increasing this to R4 will only reduce the heating load by a further 2% (ie 32%)**”.

LAW OF DIMINISHING RETURNS

All three CSIRO files tell the same story, which directly impacts onto the levels of Total R-values (for new house construction) specified in the BCA - Building Code of Australia 2010(6 Star house energy efficiency) version and earlier BCA versions. According to the *Law of Diminishing Returns* (ie increasing insulation beyond a certain point does not give any substantial additional thermal or economic benefit) **BCA roof-ceiling Total R-values cannot be and have not been unquestionably justified.**

Additional Supportive Reports

James Fricker is the engineer in Australia who co-ordinates the majority of Total R-value assessments of insulation materials, both bulk and reflective foil. His reports, herein referenced, reinforce the above CSIRO advice. See <http://fricker.net.au/> - go to Law of Diminishing Returns.

Mr.Fricker’s report was originally commissioned for ACIMA – the cellulose association.

See ACIMA website: <http://www.acima.asn.au/> - go to MORE INFO.

OVERVIEW

The HIP program R-values for ceilings ranged from R3.0 – R4.0 depending on Climate Zone assignment.

If R2.0 in ceilings was adequate insulation for CSIRO in 1981 and 1991, then why are R-values under HIP and under the BCA 2010 (R4.1 – R5.1 explained below) now being accepted? One reason could be because of the power of the vested commercial interest in the manufacture of fibreglass batts.

High R-values in Australia are often justified by reference to high R-values for building energy efficiency in the USA. This is a pointless connection because vested interests in USA do the same thing as in Australia. Fibreglass batt manufacturers vigorously push high R-value bulk insulations everywhere across the world in defiance of the Law of Diminishing Returns, as well as not subjecting their fibre batt insulations against realistic high temperature effects (refer Wren original Senate testimony).

Another reason for higher R-values today might be that historic R-value advice in Australia was focused on energy savings for winter, rather than summer, and with the ever increasing demand for airconditioning some might say that there is a need to have more insulation. If that is so, then R-values also need to be assessed for realistic summer roof space conditions as what occur across Australia, rather than anchoring the Australian-NZ Insulation Standard (AS/NZS-4859.1) on a USA laboratory test method which is based on very cold dominant winter climates of USA and Europe. Australia is the direct reverse - much milder winters and longer hotter summers. The current laboratory test method is inadequate and misleading – it measures thermal resistance of bulk insulations at a maximum 33degC, which is not representative of more typical Australian roof spaces temperatures of 50-70degC.

Cellulose (loose fill insulation) and polyester insulation industries concur with the “Law of Diminishing Returns”, because it is based on known science and truth, and have serious difficulties with installing their own products with increasing thicker bulk insulation depths. The fibreglass insulation industry exploit this and keep marketing a never ending upward spiral of high ‘material R-values’ (resistance of the batt itself) to satisfy the ‘Total R-values’(resistance of the entire ceiling-roof system) according to the BCA. The driver of all this is the never ending increase of House Energy Star Ratings as set by the BCA, recently adopted in 2010 at 6 Star for national roll out. The validity of Star ratings versus building energy efficiency has been challenged by many experts for years, but governments continuously ignore this. Are commercial vested interests driving upward star ratings?

The BCA will contend that their determination of Total R-values for ceilings (walls and floors as well) is totally justified. I contend that it is not, because the BCA bases its R-value decisions on technical modeling reports which are neither supported by peer review nor published for consumer comment. Again, these decisions are critical to the consumer’s ability to achieve Sustainable Building Energy Efficiency and contribute to the reduction of national greenhouse gas emissions.

The overarching issue is that the historic CSIRO information here in this Submission has been in the public domain for decades, but ignored by regulators and building specifiers for far too long. Why? A pretty good reason would be the decades of fibreglass batt marketing. We all know the famous marketing slogan “fatter is better” – it is legendary, it is false and should be challenged under the ACCC and Trade Practices. Consumers get bombarded with endless streams of repetitious information, so effectively they believe it and so do governments.

Now let’s extend this to Home Insulation Program. Of course the Federal Government privately consulted the fibreglass insulation industry ahead of any other bodies, two companies control about 70% of all sales of bulk and foil insulations. The government embarked on the HIP believing whatever the fibreglass industry told them, and look where we are today – just read the news. A “total train wreck” for all sectors of the industry. This is why the rectification process of HIP must continuously consult **the entire and all sectors of the insulation industry** and be alert to challenge whatever the fibreglass industry says in future.

And now 16 June, CSR Bradford Insulation have been appointed to clean up HIP:

<http://www.bpn.com.au/Article/Bradford-cleans-up-governments-insulation-mess/518873.aspx>

And increasing fires due to bulk insulations: <http://www.abc.net.au/news/stories/2010/06/16/2927894.htm>

In order to publicize the historic CSIRO information and with the increasing power of the internet, some years ago I decided to create an array of FACT sheets for the Wren website -

<http://concertinafoilbatts.com/foifacts.htm> in order to educate the public as well as the Building Code of Australia regulators. In particular refer: FACTS-8 “Law of Diminishing Returns”.

In concluding this “Overview”, I bring to the Public and National Consumers’ attention that the above information leads on now to another discussion of a decision by the ABCB (Australian Building Codes Board) that should be put on the table.

INACCURATE DESIGNATION OF HEAT FLOW DIRECTION IN BCA CLIMATE ZONES & ABUSE OF REGULATORY PROCESSES IN FORMULATION OF BUILDING ENERGY EFFICIENCY REGULATIONS IN 2003

In 2003 the ABCB set its BCA National Climate Zone Heat Flow Directions where it assigned Perth, WA as a “**Winter Heat Flow (Heat Flow Out) Climate Zone**”. This decision was based on consultations with West Australian Gallop Labor Government of the day who it said in a letter to AFIA it had consulted with FARIMA (Fibreglass & Rockwool Insulation Manufacturers Association), now ICANZ, in the face of overwhelming evidence and objection presented by AFIA (Aluminium Foil Insulation Association) who presented a technical report which included data and graphs from Western Power showing there was a higher consumption of cooling energy used during the summer months as opposed to a lower consumption of energy being used during the winter months for Perth. These files still exist today and are held by the AFIA.

In the public and national interest these mistakes cannot be allowed to be continued or repeated, and in fact ought to be corrected.

CONDENSATION

Reports on condensation are also included in this Supplementary Submission to assist the Senate Inquiry. The subject of condensation is complicated and cannot be concisely summarized although the following quotations are provided.

AS1562.1(1992) "Design and Installation of sheet roof and wall cladding" - Appendix A

"Bulk insulation keeps ceilings warmer and roofing cooler than if no insulation is installed in the cavity and, being porous, allows water vapour to reach the cold roof surface where it condenses. In addition to the physical dangers to the structure and finishes, **the increase in moisture content can reduce the effectiveness of the bulk insulation by up to 30%**. Consequently, a vapour barrier should always be installed on the warm side of any bulk insulation."

Prof R.Aynsley – "National Guidelines needed To Avoid Condensation Damage" - 14 June 2010

"**Conclusions:** Serious damage to buildings from condensation is increasing in Australia as building envelopes are tightened and thermal insulation is increased to increase energy efficiency. There is an urgent need for Australian Codes and standards to be updated to provide detailed guidance to building designers for condensation control across all of Australia's climatic conditions".

Refer also Aynsley Senate testimony (17 and oral).

In light of the above warnings however, under HIP and the BCA, bulk insulations are able to be used in roof-ceilings in any location of Australia. With increasing litigation cases regarding condensation and building damage, the usage of bulk insulations needs to be re-examined.

INSULATION IN WARM CLIMATES

Refer attachment *Aynsley- Insulation in Roof Spaces*. This report underpins the Senate Inquiry testimony of Prof Richard Aynsley and runs parallel to the AHRC 1981 QLD Report - Renouf testimony: "Answers to Questions on Notice" – 12. The Aynsley report here presents a supporting case to challenge high BCA ceiling R-values.

Aynsley report's conclusions

For naturally ventilated houses in regions of Australia, with little or no winter heating requirement, a single layer of aluminium foil insulation in ceilings is preferable to bulk insulation. Reflective foil limits the daytime surface temperatures of the ceiling...and prevents infrared radiant heat gains to occupants, and provides low thermal resistance to upward heat flow which promotes rapid cooling of the house after sundown.

This unique feature of aluminium foil insulations used in ceilings has profound implications for reducing energy demand for cooling of buildings, both naturally ventilated as well as refrigeratively cooled.

GROSS OVERSTATEMENT OF TOTAL R-VALUE OF FIBREGLASS INSULATION UNDER WINTER CONDITIONS

Senate Inquiry: Submission 23 Attachment 5 - Brian Tikey: Aluminium Foil Insulation Association.

http://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Environment_and_Communications/Completed%20inquiries/2008-10/eehp/submissions

WINTER Research testing project examining the thermal performance of fiberglass batts in ceilings (Univ SA).

Summary

This report revealed substantial divergence between 'Material R-value' and 'Total R-value'. This research paper was published in 2009 and presented to the ABCB at the Australian Building Codes Board International Conference: "**Building Australia's Future**", Gold Coast, Australia, 20-23 September, 2009. The ABCB have since appeared to be sitting on the report instead of acting on it in consultation with its authors (**M. Belusko, F. Bruno, W. Saman**) and Institute for Sustainable Systems and Technologies, University of South Australia.

NB: the BCA "Building Energy Efficiency Provisions" are founded on specified minimum Total R-values for differing climates in Australia.

Refer <http://www.abcb.gov.au/index.cfm?objectid=7384D713-28B9-11DE-835E001B2FB900AA>

Univ SA is also quoted in the Senate ORAL testimony by Tim Renouf See 17 Feb, page 81.

http://parlinfo.aph.gov.au/parlInfo/download/committees/commsen/12816/toc_pdf/7406-2.pdf;fileType=application%2Fpdf#search=%22committees/commsen/12816/0000%22

Univ SA is capable of undertaking an equivalent testing program for SUMMER to gauge the Total R-value effect in-situ (real, not laboratory) from intense downward high temperature radiation upon fiberglass batts. The federal government needs to fund such testing because the fiberglass industry never will because they fear the results.

CONCLUSION

It would appear that only the Senate Inquiry can make something happen. The claimed thermal benefits of ever increasing R-value in buildings is total nonsense, because it is in defiance of the Law of Diminishing Returns and the BCA has no such proof. BCA 2010 Total R-values are listed here to better illustrate my point. And where are the economic and thermal comfort justifications for making houses 6 Star?

For the Senate Inquiry's interest, the **BCA May 2009** states R-value for ceilings in Climate Zones 1 & 2 (dominant hot climates - northern Australia & coastal QLD) = **Total R2.7**. It was decided in June 2009 by COAG to raise ceiling Total R-values to **R5.3** uniformly across BCA Climate Zones 1-7. For Zones 1 & 2, this was a 100% increase – an astonishing increase that nobody could believe at the time.

BCA 2010 R-values have been amended to **R4.1 - 5.1**(depending on roof colour) – a range of **52% to 89%** increases in Total R-values from BCA 2009. This is still a set of unjustified R-values. A widely held belief was that the fibreglass industry were behind the original R5.3 so that they could market and sell R5.0 batts, plain and simple, and knowing that loose fill cellulose and polyester batt products could not. Then a deluge of criticisms hit the ABCB (responsible for the BCA) and seem to have relented somewhat in modifying the range of specified Total R-values.

I believe this Senate Inquiry needs to direct a secondary investigation into:

i) all claimed thermal R-values of all insulation materials, in particular bulk insulations which must be subjected to high inward radiation loads, for reasons explained in the Renouf/Aynsley testimonies, and including AHRC QLD (1981) insulation testing report

http://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Environment_and_Communications/Completed%20inquiries/2008-10/eehp/submissions
“Answers to Questions On Notice” – Item 12.

ii) limitations of insulation R-value benefits according to the Law of Diminishing Returns

iii) condensation and effects on insulation materials

iv) impacts of the above on the BCA and need for overhaul of the BCA Building Energy Efficiency Provisions. The ABCB Regulatory Impact Statement for the BCA 2010 can be challenged if this Senate Inquiry will question it. As stated in the RENOUF oral testimony, the outcomes of this Senate Inquiry have the power to immediately question the validity of the national roll out of the BCA 2010 6 Star R-values, state by state.

v) comparative thermal testing between foil and bulk insulations in hot climates – it has never been done in Australia and is absolutely necessary to end the 50 year arguments between bulk versus foil.

vi) BCA climate Zone heat flow direction for Perth, Western Australia.

The Senate needs to be mindful that northern hemisphere high R-values are all driven by winter heating energy efficiency regulations (ie heat flow out), because that is the clearly dominant direction of energy flow for the majority of the North America and Europe. Australia has much milder winters and longer hotter climates.

It is the contention of the of all the Wren Inds/Renouf Senate Inquiry testimonies that bulk insulations are the wrong insulation materials for climates in Australia experiencing dominant warm to hot climates and low or zero winter heating requirements. Reflective foil insulations are superior. Australia needs its own local insulation products better suited for our climates, rather than products suited for the northern hemisphere.

Thank you for this opportunity to provide further information to the Senate Inquiry.

Regards,

Tim Renouf

Wren Industries P/L

139 Herald St, Cheltenham VIC 3192

*Manufacturers - CONCERTINA FOIL BATTs(Product Certified) & RENSHADE

tel: 03 9532-5855 fax: 03 9532-5854 mob:0417-310523

www.concertinafoilbatts.com info@concertinafoilbatts.com

Member AFIA - Aluminium Foil Insulation Assoc. Inc (Vic1998)

www.afia.com.au (Secretary 1996-2010)

*Affil. AIRAH - Aust' Airconditioning&Heating Inc.

ICANZ disagree with many of the claims being submitted to the honourable senators today by our competitors. **We do agree, however, that a proper, independent, building research facility is needed in future to investigate claims independently and to give some direction on where we go.** Given this background of our industry, I hope you can understand, and we believe, that the government, and the departments in particular, have done a remarkably good job in setting up the process and guidelines and that, without doubt, the guidelines now are the strongest the industry has ever seen—and this is not just since these deaths have occurred. In our submission, we expressed our belief that the Energy Efficient Homes program has been extremely successful in terms of the benefits not only to the householders but to the economy, and we referred in our submission to an earlier study we did using a macroeconomic model used by the government that explains benefits that far outweigh even the savings to the householders. So, in terms of value back to the householder, this has been outstanding.

COMMENTARY (at Feb 2013) ICANZ represents two major companies manufacturing fibreglass & roll foil insulation. ICANZ has declared support for an independent building research facility, a facility referred to in Inquiry Recommendation 6. The Inquiry said that Standards Australia and the Australian Building Codes Board (ABCB) should consider responding publicly to Recommendations 6-11. They have not done so, and the question is WHY?

AUSTRALIAN PARLIAMENT: SENATE HANSARD RECORDS (Feb & March 2010) IN REFERENCE TO “SENATE INQUIRY: HOME INSULATION PROGRAM (2010)”

Senator Mary Jo Fisher (Liberal) – Senate Inquiry Chairperson, was influenced by the 17 Feb Opening Day testimonies, which revealed that bulk insulations had incorrectly labeled summer R-values in hot climates and frequently incubated houses, whereas aluminium foil insulations were proven radiant heat barriers. Senator Fisher made strong statements in the Senate, as follows.

Senate speeches: 23 Feb 2010

CENSURE MOTION: Rudd Government (waste of money)

- moved by Senator Bob Brown(GREENS)

<http://parlinfo.aph.gov.au/parlInfo/search/display/display.w3p;query=id%3A%22chamber%2Fhansards%2F2010-02-23%2F0054%22>

Senator Fisher’s speech is on pages 863-865. KEY QUOTE - page 863

“How is it that the wrong sort of insulation gets installed in the wrong places? In hot places we get insulation that keeps the heat in, instead of stopping it coming in in the first place. In cold places, it stops the heat coming in instead of the reverse. It is incubating houses in hot places, effectively, instead of cooling them. Guess what happens then? Householders utilize electricity or whatever they have got that supposedly ain’t good for the environment to neutralise the effects of the insulation that was supposedly put in there to help the environment. Not serious about censuring the government? Please! Tell that to those who really want to believe that the Home Insulation Program was going to stimulate the economy, create and protect jobs, and help the environment.”

Senate speeches: 18 March 2010

MOTION: Rudd Government (waste of money)

<http://parlinfo.aph.gov.au/parlInfo/search/display/display.w3p;query=id%3A%22chamber%2Fhansards%2F2010-03-18%2F0246%22>

Senator Fisher’s speech is on pages 2302-2305. Extracts here:

“Despite the foretelling of these risks, Rudd Labor ploughed ahead. Rudd Labor ploughed ahead announcing a program in February 2009 for implementation in July 2009. It was five months in gestation before its implementation. In that mismanaged program, there were no plans like, ‘Let us make sure we put the right insulation in the right places,’ and, ‘We install the insulation that is suited for the purpose: we make sure that in hotter climates we do not install the sorts of insulation that keep hothouses hot’ – basically, makes them mini-incubators...”

What of the goals of the Home Insulation Program? It was supposed to stimulate the economy. It was going to cost the Australian taxpayer some \$2.7 billion and it now looks like it will cost that and then some by the time the mess is fixed up and the new program implemented—how is that a net stimulus to the economy? How does a program create jobs when workers were sacked at the stroke of a ministerial pen, when Minister Garrett suspended a supposedly successful program? How does a program achieve its so-called environmental aims when the wrong insulation is put in the wrong places in the wrong climates, meaning that householders have little option other than to use airconditioning when the insulation should have done the job and to use heating when the insulation should have done the job?”