



3/362 kent street
sydney ns w 2000
po box a274
sydney south ns w 1235

████████████████████
████████████████████
COMMONEQUITY.COM.AU

13 April 2018

Committee Secretary
Senate Economics Legislation Committee

Re: Inquiry into the National Housing Finance and Investment Corporation Bill 2018 and; the National Housing Finance and Investment Corporation (Consequential Amendments and Transitional Provisions) Bill 2018

The Senate has referred the National Housing Finance and Investment Corporation Bill 2018 (NHFIC bill) and the National Housing Finance and Investment Corporation (Consequential Amendments and Transitional Provisions) Bill 2018 (NHFIC consequential amendments bill) to the Senate Economics Legislation Committee for inquiry and report by 7 May 2018.

Common Equity NSW would like you to be aware of our position in regard to the proposed legislation:

- Due to the significant level of unmet demand for affordable housing, we are keen to see the establishment of NHFIC as soon as possible and without delay.
- We believe that the draft legislation is fit for purpose as is and does not require amendment.
- Whilst there are several minor changes that could be made to improve the draft Investment Mandate Direction, we would prefer that this be dealt with via Ministerial Direction in the future as the most administratively efficient and timely mechanism.
- We strongly recommend that Ministerial Direction (as opposed to Regulation) be retained as the mechanism to make future changes to the Investment Mandate. We base this view on the Community Housing Sector's lived experience of the National Rental Affordable Housing scheme which has operated via Regulation and led to significant complications and delays in addressing issues that have arisen from time to time. This will be particularly important in the establishment phase of NHFIC as it will allow it to be more responsive to the Community Housing Sector's needs.

We are very happy to discuss any of these points with you.

Yours sincerely

████████████████████
████████████████████

James Brown
CEO
Common Equity NSW