

1 July 2024

Katie Brown  
Executive Director Electrification, Efficiency and Safety  
Department of Energy, Environment and Climate Action

Submitted online: <https://engage.vic.gov.au/>

Dear Ms Brown,

**Re: Minimum Standards for Rental Properties and Rooming Houses**

On behalf of our members, the Victorian Greenhouse Alliances (VGAs) are pleased to provide this response to the *Residential Tenancies and Residential Tenancies (Rooming House Standards) Amendment (Minimum Energy Efficiency and Safety Standards) Regulations 2024*.

The VGAs are formal partnerships of local governments and statutory agencies driving climate change action across Victoria's municipalities. The VGAs deliver regional mitigation and adaptation programs that provide economies of scale and enable projects typically beyond the reach of individual councils and agencies. Our project work is complemented by targeted advocacy, capacity building and regional partnerships.

We would like to congratulate the state government on this significant and important legislative and regulatory reform that will deliver positive outcomes for the Victorian community. We welcome the proposed changes which will make significant improvements to Victoria's rental building stock, support renters in the energy transition, address current market failures and drive down household operating costs. The Regulatory Impact Statement (RIS) provides a robust assessment of these benefits and establishes a clear evidence-base supporting the reforms. We also note that these changes will indirectly support health and wellbeing outcomes for renters and rooming house tenants through more affordable thermal comfort.

The new proposed standards are a strong start and a critical step in the right direction towards comprehensive minimum standards in Victoria. It is important that the introduction of minimum standards is fast-tracked to support reduced energy costs and improved well-being for lower income renters and rooming house residents who are particularly vulnerable to the current cost of living crisis. Enhanced regulation on rental increases are required in tandem to ensure the benefits are accrued by lower income tenants. Proper enforcement of compliance is also needed for these standards to be effective, to reduce pressures on Consumer Affairs Victoria/VCAT, and to ensure the rights of renters are protected.

In addition, we urge the state to consider the following recommendations for further improvements:

- Including top-up insulation to R5 for homes with less than R2 insulation (as per the ACT model).
- Supporting simple and low-cost measures like fly screens, ceiling fans, window coverings, and shading to improve ventilation and cooling.
- Working towards performance-based standards based on the Residential Scorecard and tied to mandatory disclosure requirements as a key strategy for compliance.
- Gas stoves should be phased out and replaced with induction cooktops to help renters realise the health benefits and cost savings associated with a fully electrified home and support decarbonisation.



We would welcome the opportunity to speak with you directly regarding this submission to discuss how we can leverage the respective capabilities and resources of all levels of government to ensure the best outcomes for Victorian communities.

### Greenhouse Alliances and contacts

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  - o Moira Shire Council
  - o Murrindindi Shire Council
  - o Towong Shire Council
  - o Strathbogrie Shire Council
  - o Wangaratta Rural City Council
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*This letter has been approved through the Greenhouse Alliances governance structures but may not have been formally considered by individual members. The submission does not necessarily represent the views of all members.*