



# Submission in response to the draft Residential Tenancies and Residential Tenancies (Rooming House Standards) Amendment (Minimum Energy Efficiency and Safety Standards) Regulations

11 July 2024

Our offices are on Wurundjeri Woi Wurrung Country. Our work gives us a special insight into the value of place and home, and we respect the Wurundjeri people's ongoing connection to Country, culture, and community. We also acknowledge the connection of all First Nations peoples on whose Country Victoria is today situated. We recognise that sovereignty was never ceded and pay our respects to Elders past and present.

## About Tenants Victoria

Tenants Victoria is the peak body for the state's renters, who number almost 2 million people. Our vision is for safe, secure and affordable homes for Victorian renters in a fair housing system. For many renting is a permanent situation rather than a transition from the family home to home ownership. We believe all renters, including rooming house residents, should be able to afford a home that allows them to live full lives and contribute to their communities.

Founded in the 1970s by renters, we aim to empower all renters and make sure their voices are heard in our advocacy. We work in partnership with other community legal centres and housing sector organisations, and strategically with government to inform policy development and enhance service delivery.

Our services include information, legal representation and advice, financial counselling, and outreach. We aim to make the housing system fairer in several ways We advocate for practices and attitudes that respect renting and for policies and laws that support the rights of renters. We increase the skills of the community workers who assist renters. We provide information that encourages rental providers and real estate agents to act responsibly.

## Acknowledgments

Tenants Victoria acknowledges the support of the Victorian Government.



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*Safe, secure and affordable homes*

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## Summary

Thank you for the opportunity to provide input towards this important regulatory review. Tenants Victoria welcomes the proposed amendments to the minimum standards for rental properties and the minimum standards for rooming houses as set out in the draft *Residential Tenancies and Residential Tenancies (Rooming House Standards) Amendment (Minimum Energy Efficiency and Safety Standards) Regulations*.

The introduction of these minimum standards is a significant reform that will reduce carbon emissions, lower the cost of living for renters, and improve their health. It will also help to reduce financial hardship and social inequity resulting from the current rental crisis, where so many low-income renters have few options but to remain living in a poor-quality inefficient rental home. These standards are an important first step, noting there are strong reasons to raise them now, and to continue to strengthen them as rapidly as possible to further assist renters and speed Victoria's transition to net zero. We commend the government for its strong social and environmental leadership.

Although we are pleased to see such a comprehensive range of energy efficiency improvements proposed for rental properties (insulation, draughtproofing, energy efficient heaters and coolers, and hot water systems), we consider there are compelling reasons to also require top up insulation for rental properties, and to broaden the standards proposed for rooming houses. Adding energy efficient appliances to rental properties or rooming houses without adequate insulation risks undermining low-income renters' capacity to manage rent increases. In Victoria's affordable accommodation and cost of living crises, those who cannot meet these costs risk eviction into homelessness.

Importantly, minimum standards are only as effective as the degree to which they are complied with. The technical nature of these standards means renters will be less capable of identifying breaches and self-advocacy; rental providers and agents will also require information and education to understand their obligations. We recommend that Consumer Affairs Victoria (CAV) consider options to strengthen enforcement activity including increasing property inspections and empowering compliance officers to issue on-the-spot infringement notices. Director Guidelines will be necessary to clarify the meaning of some ambiguous terms such as 'unreasonable' and 'end of life'. As these standards involve the intersection of several government policy objectives and areas of regulatory responsibility, CAV may benefit by establishing a dedicated energy efficiency compliance taskforce to leverage cross-government regulatory expertise.

Finally, the effectiveness of these new minimum standards can be further supported by government funding the development of centralised best practice processes and resources and closely monitoring the implementation of the standards in consultation with key tenancy sector organisations. We also recommend establishing a mechanism whereby the appliance minimum star ratings can be raised over the 10-year regulatory term, keeping them relevant as technology advances, market supply conditions change, and costs reduce.

## Key recommendations

**Recommendation 1:** Require top up insulation for rental properties with existing but inadequate insulation.

**Recommendation 2:** Reduce the discrepancy between the minimum standards for rental properties and rooming houses by requiring insulation, draughtproofing and external shading devices for rooming houses.

**Recommendation 3:** Consider trialling the effectiveness of community-based social marketing techniques to encourage safe and responsible energy use by rooming house residents.

**Recommendation 4:** Mandate disclosure of a holistic performance-based energy efficiency rating for rental properties at the time of advertising and before leasing.

**Recommendation 5:** Ensure that appropriate laws, standards and processes are in place to minimise safety risks to renters and workers.

**Recommendation 6:** Make exemptions from minimum standards contingent on rooming houses complying with electricity safety standards.

**Recommendation 7:** Consult with the community housing sector as to what support is required to ensure all renters receive the benefit of these energy efficiency reforms.

**Recommendation 8:** Build the capacity of the community housing and private rental sectors to carry out energy efficiency improvements by funding the development of central support processes, community education strategies, and best practice resources.

**Recommendation 9:** Strengthen the capacity of CAV's compliance and enforcement team to inspect properties, identify breaches and issue on-the-spot infringement notices.

**Recommendation 10:** Develop Director Guidelines to clarify ambiguous terminology.

**Recommendation 11:** Require rental providers to obtain a certificate of compliance and disclose it to renters before advertising for rent or entering a rental agreement.

**Recommendation 12:** Create additional opportunities to penalise rental providers for non-compliance in VCAT processes.

**Recommendation 13:** Consult with Tenants Victoria to develop changes to the *Residential Tenancies Act 1997* to ensure section 65A supports the compliance timing proposed in the draft regulations.

**Recommendation 14:** Include a mechanism whereby the appliance minimum star ratings can be raised during the ten-year lifespan of the regulations as technology advances and costs reduce.

**Recommendation 15:** Require mandatory professional development training for agents and property managers on energy efficiency minimum standards.

**Recommendation 16:** Boost funding for tenancy support services to assist renters understand and enforce their rights.

**Recommendation 17:** Establish a process to enable regular feedback to CAV on the implementation of the new minimum standards.

## Top up insulation for rental properties

The proposed minimum standards for rental properties prescribe ceiling insulation, draughtproofing, hot water systems, cooling, and the uplift of current standards for heating and shower roses (as well as a new safety standard for blind cord anchors). Subject to our comments below regarding top up insulation, Tenants Victoria strongly supports this comprehensive range of improvements for rental properties, which are expected to bring immense benefits to the health, comfort and wellbeing of renters.

We note that the draft standards do not require top up insulation in rental properties that have some existing insulation. As the effectiveness of insulation can vary greatly according to the level and condition of the insulation, we recommend that top up insulation to the same R5 standard be required for properties with existing but insufficient insulation. As explained below, establishing a minimum baseline thermal effectiveness by requiring R5 levels in all rental properties will support government energy, health and climate policy objectives, whereas not requiring top up insulation will undermine them.

Insulation is the most cost-effective way to improve the energy efficiency and comfort of homes and can save households up to 45% on energy bills<sup>1</sup>. Ceiling insulation can save 20% on heating and cooling costs<sup>2</sup>. Exposure to energy hardship is more likely when vulnerable people live in older poor-quality dwellings built before the introduction of National Home Energy Ratings Standards.<sup>3</sup> There is a mounting body of research which sets out the increasing impact of climate change on renters in particular through excessive heat<sup>4</sup>, as well as the adverse health and wellbeing impacts of poorly insulated and cooled homes<sup>5</sup>. Cold homes have a higher prevalence of mould, and are linked to a range of health impacts, such as increased blood pressure, asthma, and poor mental health.

We also consider that it is especially important during Victoria's current affordable renting and cost-of-living crises to avoid unnecessarily high energy costs for vulnerable renters in marginal tenancies. Top up insulation will help retain heat and reduce the need to run heaters, lowering renter electricity costs. Lowering electricity bills strengthens renter capacity to handle rent increases, thereby reducing the risk that disadvantaged low-income renters face eviction for rental arrears.

**Recommendation 1:** Require top up insulation for rental properties with existing but inadequate levels of insulation.

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<sup>1</sup> 'Insulation', *Department of Energy, Environment and Climate Action (Vic)* (Web Page, 7 September 2022) <<https://www.energy.vic.gov.au/for-households/victorian-energy-upgrades-for-households/insulation>>.

<sup>2</sup> 'Home Ceiling Insulation', *Sustainability Victoria* (Web Page, 15 September 2022) <<https://www.sustainability.vic.gov.au/energy-efficiency-and-reducing-emissions/building-or-renovating/key-principles-of-energy-efficient-design/planning-and-design/insulation/ceiling>>.

<sup>3</sup> Daniel, L., Moore, T., Baker, E., Beer, A., Willand, N., Horne, R., and Hamilton, C. (2020) Warm, cool and energy-affordable housing policy solutions for low-income renters, AHURI Final Report No. 338, Australian Housing and Urban Research Institute Limited, Melbourne, <https://www.ahuri.edu.au/research/final-reports/338>

<sup>4</sup> See Hot homes: Renter Researchers' experiences of summer 21-22 - Better Renting; MalleeFamilyCare\_PublicHousing\_Report\_2019.pdf; Renters suffer more in extreme heat, study shows (smh.com.au)

<sup>5</sup> Ibid. See also: Feeling-the-Heat.pdf (vcoss.org.au)

## Standards for rooming houses

Tenants Victoria supports requiring fixed energy efficient electric heaters to rooming house rooms, which will improve thermal comfort and health of residents. We recommend however that the energy efficiency standards proposed for rooming houses be extended to include a broader range of cost-effective improvements, including insulation and draughtproofing to make running the fixed heaters more cost-effective, as well as external shading devices to improve thermal comfort.<sup>6</sup>

As explained above, in the context of Victoria's current rental affordability and cost of living crises, we consider it highly important to safeguard low-income renters against the risk of unnecessarily high electricity costs undermining otherwise sustainable tenancies. Unless rooming house rooms are separately metered, electricity costs for residents heating their rooms are required to be paid by rooming house operators.<sup>7</sup> Increasing electricity costs are commonly passed to residents as rent increases. Often on very low pension incomes and lacking alternative affordable accommodation options, rooming house residents are especially vulnerable to eviction into homelessness. As rooming houses are currently exempt from land tax, now is a useful time to require insulation and a wider range of cost-effective improvements to help keep electricity costs down and marginal tenancies sustainable.

The proposed regulations require that fixed energy efficient heaters be installed in every rooming house room. The addition of these heaters may either increase or lower overall energy use—it will depend largely on the extent residents previously used inefficient portable heaters. The benefit of introducing energy efficient heaters can also vary considerably depending on resident energy use and behaviour. 'Energy use rebound' can occur where more energy is used after the installation of energy efficient appliances on the understanding that there is less reason to continue energy saving behaviour.<sup>8</sup> Requiring insulation and draughtproofing in rooming houses will help to retain the heat generated by the new heaters, reducing the need to run them as hard.

To further reduce the risk of energy rebound, we recommend that government consider the use of community-based social marketing techniques, such as signs to prompt residents to turn off heaters and lights when rooms are left vacant. Research has demonstrated that these techniques can be highly successful in fostering energy-saving behaviour.<sup>9</sup>

Finally, setting the rooming house standards at high levels closer to the proposed rental property standards will assist government achieve its energy and climate policy objectives by closing a possible loophole. The large difference between proposed standards creates an incentive for rental providers to reduce compliance costs by converting large private rental properties (i.e. those with 4 or more rooms) to rooming house accommodation. This arbitrary change in classification means the same large house will no longer receive insulation and draughtproofing or any of the other improvements required for

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<sup>6</sup> 'Home windows and shading for energy efficiency', *Sustainability Victoria* (Web Page, 30 January 2024) – <<https://www.sustainability.vic.gov.au/energy-efficiency-and-reducing-emissions/building-or-renovating/key-principles-of-energy-efficient-design/planning-and-design/windows-and-shading>>

<sup>7</sup> Section 108 Residential Tenancies Act 1997

<sup>8</sup> 'Energy-related behaviour and rebound when rationality, self-interest and willpower are limited' *Nature Energy* 11 Oct 2021 <<https://www.nature.com/articles/s41560-021-00889-4>>

<sup>9</sup> McKenzie-Mohr D. 'Fostering sustainable behaviour through community-based social marketing'. *Am Psychol*. May 2000 <<https://pubmed.ncbi.nlm.nih.gov/10842434/>>

rental properties, denying the government of its energy and climate policy intentions. Occupancy rates of the same large house being used as a rooming house may increase as rooming house operators commonly try to lease every room to maximise profits, further increasing the same building's energy use and carbon footprint. The conversion of rental properties to rooming houses (many of which remain unregistered and are run by unlicensed operators) may also result in unintended poor housing outcomes such as placing residents in precarious tenancy arrangements that are ripe for exploitation and accelerating the removal of large rental properties from the rental market at a time when more rental stock is urgently needed.<sup>10</sup>

**Recommendation 2:** Reduce the discrepancy between the minimum standards for rental properties and rooming houses by requiring insulation, draughtproofing and external shading devices for rooming houses.

**Recommendation 3:** Consider trialling the effectiveness of community-based social marketing techniques to encourage safe and responsible energy use by rooming house residents.

## Mandatory disclosure of energy efficiency ratings

Tenants Victoria supports amending the *Residential Tenancies Act 1997* to mandate disclosure of a holistic performance-based energy efficiency rating for rental properties at the time of advertising and before leasing, so that prospective renters can make informed decisions about whether a proposed home meets their needs and budgets before signing new rental agreements. Mandatory disclosure may also help incentivise rental providers to improve the energy efficiency of their properties beyond minimum standards, for example by installing solar or purchasing appliances with higher star-ratings.

A mandatory disclosure scheme is now in place in New Zealand through its Healthy Homes program.<sup>11</sup> All new or renewed tenancy agreements must include specific information about the rental property's current level of compliance with the Healthy Homes standards. In Victoria, the Residential Efficiency Scorecard could support a mandatory disclosure process. The Scorecard program is already well used with assessments for existing homes generally costing from \$250 to \$500. Rebates are provided by some local councils and community organisations.<sup>12</sup>

**Recommendation 4:** Mandate disclosure of a holistic performance-based energy efficiency rating for rental properties at the time of advertising and before leasing.

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<sup>10</sup> 'Rental Stock Plummets by 15,600 homes in Victoria, as squeeze tightens on tenants' The Age, 10 June 2024) <<https://www.theage.com.au/politics/victoria/rental-stock-plummets-by-15-600-homes-in-victoria-as-squeeze-tightens-on-tenants-20240604-p5jj6t.html>>

<sup>11</sup> New Zealand Healthy Homes Program <<https://www.tenancy.govt.nz/healthy-homes/>>

<sup>12</sup> 'What is a Scorecard Assessment and How can it Help Me?', *Residential Efficiency Scorecard* (Factsheet, 21 June 2023) <<https://www.homescorecard.gov.au/about-scorecard/what-is-a-scorecard-assessment-and-how-can-it-help-me>>.



## Electricity and insulation safety risks

Installing appliances and insulation can involve significant safety risks, including:

- Risk of house fire to renters if insulation is laid over unsafe electrical wiring
- Risk of house fire or electrocution to renters if electrical appliances are installed in properties without compliant wiring or safety switchboards, and
- Workplace health and safety risks for electricians and persons installing insulation, including death from electrocution or heat stress.

We assume that appropriate electricity safety laws, standards, checks and training processes are in place to support the safe implementation of works required to meet these proposed standards. We also assume that appropriate workplace health and safety laws and checks are in place to protect workers, and that government has considered relevant recommendations from the 2014 Royal Commission<sup>13</sup> into the Federal Government's *Home Insulation Program*.

Electricity safety is a significant risk for renters who live in old, dilapidated rental housing and rooming houses with non-compliant wiring and switchboards. Tenants Victoria has for many years run an outreach support program for rooming house residents. Our outreach worker reports that despite current minimum standards requiring at least two power outlets in working order, many rooms have only one outlet from which residents commonly use 'piggybacked' multi-plug power boards to charge numerous devices including coolers and refrigerators. It is noted from the Scarff Inquiry Coroner's Report that electrical overload from piggybacked power boards was found to be a potential cause of the fire causing the death of Peter Scarff.<sup>14</sup> To support the safe use of heaters and multiple appliances in every room, it will be important that wiring be upgraded where necessary to reduce the risk of electrical faults from overloaded circuits. As resident safety should be considered paramount, we recommend that exemptions only be granted if the rooming house meets electricity safety standards.

Other health and safety suggestions include:

- Consider whether future heater standards should specify output capacity with reference to room size to ensure heaters have sufficient power to be effective.
- Accelerate the phase out of gas heaters and cooktops as early as possible to improve air quality. Providing Director Guidelines that tighten the term 'end of life' could help deter rental providers from continually repairing old, inefficient gas appliances.

**Recommendation 5:** Ensure that appropriate laws, standards and processes are in place to minimise safety risks to renters and workers.

**Recommendation 6:** Make exemptions from minimum standards contingent on rooming houses complying with electricity safety standards.

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<sup>13</sup> Wikipedia entry on Royal Commission into the Home Insulation Program  
<[https://en.wikipedia.org/wiki/Royal\\_Commission\\_into\\_the\\_Home\\_Insulation\\_Program](https://en.wikipedia.org/wiki/Royal_Commission_into_the_Home_Insulation_Program)>

<sup>14</sup> Scarff Inquiry Report dated 26 October 2023 - Coroner Paul Lawrie

## Community housing sector

Not-for-profit community housing organisations (CHOs) are responsible for managing extensive property portfolios and large numbers of tenancies with limited resources, income and financial reserves. Undertaking such a large improvement program at scale is expensive, complex and challenging. However, renters in community housing should enjoy the rights and protections of other renters. Government should consult with the community housing sector as to what support is required to ensure all renters receive the benefit of these important reforms.

**Recommendation 7:** Consult with the community housing sector as to what support is required to ensure all renters receive the benefit of these energy efficiency reforms.

## Capacity building opportunities

Given the scale, cost and importance of this work, it will be important for government to consider ways to build the capacity of the community housing sector and the private rental sector to carry out the works as effectively and efficiently as possible. This may include funding education and training, developing centralised support processes and best practice resources, and running public information and education campaigns that leverage existing community partnerships. It will also be important to build in ways to monitor and evaluate results and capture and share lessons.

As the successful implementation of these minimum standards will benefit everyone, there may be opportunities for innovative cross-sector collaboration. Programs could be designed to leverage extensive community networks of both rental provider organisations (Real Estate Institute of Victoria, Registered Accommodation Association of Victoria, and Community Housing Industry Association of Victoria (CHIA Vic)), renter organisations (Tenants Victoria and Victorian Public Tenants Association) and other community groups (Victorian Council of Social Service and Brotherhood of St Laurence). Extensive sustainability and building expertise within Sustainability Victoria and university research schools could help in designing and evaluating programs.

Other ideas include:

- Establish central processes to facilitate bulk buys of appliances and equipment.
- Establish a board of approved suppliers/installers to complete works at agreed discounted rates.
- Fund an energy efficiency organisation like Renew to publish a current list of compliant appliances to make purchasing decisions easier for rental providers.
- Create FAQs, checklists or guides on resolving commonly occurring issues. (For example, tips on working with renters<sup>15</sup>).

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<sup>15</sup> *Energy efficiency in the Community Housing Sector: The Impact of the Victorian Property Fund's Environmentally Sustainable Funding Round 2017-18* Community Housing Industry Association (VIC) < 11787-CHIA-Victorian-Property-Fund-Report-Singles-1.pdf (chiavic.com.au)>

The Minister for Consumer Affairs has the power to fund public information and education campaigns on renting, as well as programs to improve the energy efficiency of social housing, through grants from the Victorian Property Fund.<sup>16</sup>

**Recommendation 8:** Build the capacity of the community housing and private rental sectors to carry out energy efficiency improvements by funding the development of central support processes, community education strategies, and best practice resources.

## Compliance and enforcement

Effective compliance and enforcement of the new energy efficiency minimum standards will be important not only to protect the rights and wellbeing of renters but also to ensure that Government meets its climate policy objectives including the *Gas Substitution Roadmap*<sup>17</sup> and transition to net zero by 2045.<sup>18</sup>

The current enforcement paradigm relies on renters to enforce the laws, despite having less power and fearing retaliation through eviction or rent increases. The technical complexity of these standards means that renters are unlikely to be as capable of identifying when the standards are not met and less able to self-advocate; rental providers and agents will also require support to understand their obligations. To recognise breaches, compliance officers will require specialist knowledge of energy efficiency products, appliances, and rating schemes as well as installation barriers and typical market costs.

The wording of some terminology is ambiguous and open to subjective interpretation. (For example, requirements vary depending on whether installation costs are ‘unreasonable’ or water pressure is ‘sufficient’; appliances must be replaced at ‘end of life’.) Director Guidelines will be necessary to provide greater clarity to reduce innocent or deliberate misinterpretation. Directors Guidelines should also provide guidance on rental provider obligations where other Acts and Standards provide the framework for compliance. Different compliance strategies and penalties should apply to rental providers who attempt to do the right thing and those who actively evade their responsibilities.

As the responsible authority for monitoring and enforcement of the *Residential Tenancies Act 1997*, Consumer Affairs Victoria should be appropriately resourced to respond to complaints, pro-actively audit properties, and apply significant penalties to deter noncompliance. While Tenants Victoria welcomes the government’s Renting Taskforce initiative announced in the Housing Statement, ongoing additional funding and commitment will be required to build and maintain the skills, knowledge and capacity of CAV’s compliance and enforcement team to hold non-compliant rental providers to account. Given these minimum standards involve the intersection of policy objectives in several subject

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<sup>16</sup> Sections 76(3)(a)(vi) and (h)(i) of the *Estate Agents Act 1980*.

<sup>17</sup> <https://www.energy.vic.gov.au/renewable-energy/victorias-gas-substitution-roadmap>

<sup>18</sup> <https://www.climatechange.vic.gov.au/climate-action-targets>

areas (residential tenancies, climate action, energy, and electricity safety) overseen by different departments and regulators (Consumer Affairs Victoria; Department of Energy, Environment and Climate Action; and Energy Safe Victoria), there may be benefits to CAV creating a joint enforcement taskforce or establishing a cross-department secondment process to leverage compliance expertise.

Suggestions to strengthen compliance include-

- Requiring rental providers to obtain a certificate of compliance from a qualified assessor when advertising a property for rent or before letting their property. Section 30D could be amended to require residential rental providers to present the compliance certificate to a proposed renter before they enter a new rental agreement.
- Empowering CAV officers to inspect for compliance with energy efficiency standards and issue on-the-spot infringement notices. This could occur through an audit process (like an ATO tax audit) or when CAV officers visit a rental property for other purposes such as to carry out a rent increase assessment.
- Listing whether a rental property complies with energy efficiency minimum standards as a new consideration when the Victorian Civil and Administrative Tribunal (VCAT) determines whether a rent increase is reasonable under section 47(3).
- Requiring that rental providers who consider the need to meet a standard 'unreasonable' to apply to VCAT for an exemption order, and that any order granting an exemption be published on a public register.

**Recommendation 9:** Strengthen the capacity of CAV's compliance and enforcement team to inspect properties, identify breaches and issue on-the-spot infringement notices.

**Recommendation 10:** Develop Director Guidelines to clarify ambiguous terminology.

**Recommendation 11:** Require rental providers to obtain a certificate of compliance and disclose it to renters before advertising for rent or entering a rental agreement.

**Recommendation 12:** Create additional opportunities to penalise rental providers for non-compliance in VCAT processes.

## Compliance timing issues

Under the proposed regulations, there are different commencement rules and compliance timing requirements for different improvements. Some improvements such as cord blind safety anchors and fixed heaters for rooming houses without existing heaters have a hard compliance deadline *by* 30 October 2025, whereas other improvements are required *from* 30 October 2025, either when there is a new agreement (or conversion from a fixed term to a periodic tenancy) or at the end of life of appliances.

In our view, there is doubt whether the *Residential Tenancies Act 1997* in its current form supports the compliance timing in the proposed regulations. The legislation as it stands does not compel the rental provider to carry out improvements to meet higher minimum standards that come into effect after the tenant has entered possession. (Section 65A obliges a rental provider to comply with the minimum standards in place at the time the renter *enters into occupation of the premises*.) So long as the premises complied with the minimum standards in place at the time the renter moved in, no breach is committed

under the section by a rental provider who does not keep up with later minimum standards. This interpretation was recently supported by *Niblett v Broadbent (Residential Tenancies) [2023] VCAT 1236 (6 November 2023)*.

As proposed, the transition arrangements result in the perverse situation where it disadvantages a renter to stay in their existing rental. If a renter under an existing lease wants to live in a more energy efficient home, they will need to move premises and begin a new lease after the new regulations take effect on 30 October 2025.

**Recommendation 13:** Consult with Tenants Victoria to develop changes to the *Residential Tenancies Act 1997* to ensure section 65A supports the compliance timing proposed in the draft regulations.

## Regular review of star ratings

To cut emissions faster and help maximise health and financial benefits for renters, we recommend that the proposed regulations contain a mechanism whereby the appliance minimum star ratings can be raised during the ten-year lifespan of the regulations without the government needing to complete a comprehensive regulatory review. This will enable the government to revise appliance standards in a timely manner, keeping them relevant as technology advances, market supply conditions change, and costs reduce.

**Recommendation 14:** Include a mechanism whereby the appliance minimum star ratings can be raised during the ten-year lifespan of the regulations as technology advances and costs reduce.

## Real estate agent training on minimum standards

In keeping with commitments made in the Victorian Housing Statement, the government should require that estate agents and property managers complete continuing professional development courses on the energy efficiency minimum standards to ensure they are able to provide rental providers and renters with accurate information about their obligations and rights.

**Recommendation 15:** Require mandatory professional development training for agents and property managers on energy efficiency minimum standards.

## Boost tenancy support services

The introduction of these energy efficiency minimum standards will generate additional demand for tenancy support services as renters attempt to understand and enforce their rights. We recommend that government increase funding to community legal centres and other not-for-profit community organisations that manage renting support programs to reflect the anticipated additional workload.

**Recommendation 16:** Boost funding for tenancy support services to assist renters understand and enforce their rights.

## Implementation oversight process

It will be important that any implementation issues with the roll out of these minimum standards are identified as early as possible and strategies put in place to address those issues. We recommend that CAV consider establishing a process that enables a broad range of tenancy sector organisations to provide regular feedback to inform the implementation process.

**Recommendation 17:** Establish a process to enable regular feedback to CAV on the implementation of the new minimum standards.