

RESPONSES TO QUESTIONS TAKEN ON NOTICE

COUNCIL MEETING 19 JUNE 2024



Public Question Time

Question from Dick Gross:

When I was last on council, I attended a regional workshop on loneliness at Bayside. The academic there argued that loneliness can be as dangerous for the lonely as smoking. She also said that informal opportunities for gathering, like meeting other dog walkers, is a vital antidote to the scourge of loneliness. Formal activities, like employment and school communities, have their role but the informal ones, like meeting at dog off-leash parks, are so important. Has the loneliness conundrum been factored into Council's thinking on the off-leash issue, given that this municipality has such a high number of single dwellings and single people?

Response:

Dogs are a prominent part of our community, with over 8,617 dogs registered as living in the City of Port Phillip. This number has steadily increased over the last 5 years, especially due to the COVID-19 pandemic.

To inform the preparation of the draft Dog Off-Leash Guidelines, we have undertaken research into the importance of dogs to the health and wellbeing of their owners. This research showed that:

- there are a number of social and health benefits owners associate with owning a pet, with dog owners talking to more people because of their dog and exercising more and meeting new people via social media because of their dog*
- dog owners are likely to say 'their dog is part of their family', 'they provide great comfort in times of need', 'they give unconditional affection' and a 'strong reason for living'*
- Animal Medicines Australia (AMA) research suggests that the primary reason dogs owners give for getting a dog is companionship (52%), for their mental health (23%) and for relaxation (20%).*

This research has informed the Guidelines. The Guidelines have also been informed by our knowledge of how the community uses our open spaces for social connectedness now that more people live alone and in higher density living environments.

We are trying to get the balance right in the Guidelines by providing a fair distribution of dog off-leash areas across the municipality for our community to access, while ensuring that these areas do not negatively impact other user groups or people living near our dog parks.

Question from Charlotte Frajman:

I am here to raise the topic of Cit of Port Phillip's responsibility and obligation to their own workers and employees, specifically the Local Law officers. The ten-year review, the 2023 Port Phillip Community Amenity Local Laws have left your own workers exposed and vulnerable on a daily basis. I specifically refer to Part 4 in relation to "Camping on Council land". This section is so vague and has such broad conditions to basically overturn any possibility for your own employees to rein in and wrangle any of the antisocial elements and issues, such as camping, trolleys and objects, and has now endangered your own local law employees. Would consider repealing Part 4, Section 42, Part 2 and allow each incident and

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situation to be judged on its individual merit and circumstances, rather than a blanket free pass

Response:

As outlined by Chris Carroll and Brian Tee on the night, we take the safety of our staff very seriously. As you acknowledged, City of Port Phillip Local Laws Officers do an incredible job in very difficult circumstances. They work closely with police when required, but it can be a very dangerous job. City of Port Phillip is very conscious of their occupational health and safety issues and have a range of policies, risk assessments and standard operating procedures to support our staff to be as safe as possible when working in the field.

The major concern for staff is not in response to genuine homelessness and vulnerable people on the street. It is in response to criminal activity, violence and weapons which are all things that can be policed.

There is nothing in the current City of Port Phillip Local Law that prevents criminal activity from being policed, however the roles of Local Laws officers are significantly different to Police. Council staff regularly issue fines and organise clean ups for abandoned trolleys, camping material and objects left in public spaces while also working with a range of stakeholders to support people experiencing homelessness or who have complex needs.

At this stage we would not look to repeal Part 4, Section 42 of the Local Law.

Councillor Question Time

Question from Councillor Pearl:

I met with traders at Clarendon Street, South Melbourne this morning, who expressed concerns regarding the closure of the parking on one side of the street and they asked whether or not we'd be able to put signs and awnings up indicating that businesses are still open in that area and whether or not we can change parking restrictions to be fee-free to compensate the loss of one hour parking along Clarendon Street, and do that compensation on Bank Street and Dorcas Street.

Response:

Seven signs will be installed on the temporary fencing on Clarendon St by Tuesday. Council have also received a quote to temporarily alter parking restrictions around the Verandahs Heritage project in Clarendon Street. Total cost will be \$4k to temporarily change the signs plus Officer time. There will also be work involved in reprogramming the parking meters so that the signs and meters align – if not, officers are open to requests for refunds etc. Proceeding with this could also set a precedent for Council being asked to alter parking restrictions to support projects that are not led by officers – which officers would be reluctant to enter into. The 'open for business' signage is proceeding as advised last week. Considering this – and that no CRMs have been received on the matter, we don't recommend proceeding. If we do receive significant complaints in the upcoming week or so, we can reconsider.

Question from Councillor Nyaguy:

Can officers provide an update on the process of our submission on the minimum standards for rental properties and rooming houses

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Response:

As requested at Council Meeting on Wednesday 5th June 2024, you asked to see this submission prior to it being provided to Engage Victoria. It will be submitted on 1 July.

Please see SECCCA's draft submission below:

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1 July 2024

Katie Brown

Executive Director Electrification, Efficiency and Safety

Department of Energy, Environment and Climate Action

Submitted: <https://engage.vic.gov.au/new-minimum-standards-for-rental-properties-and-rooming-houses>

Dear Ms Brown,

Re: Minimum Standards for Rental Properties and Rooming Houses

On behalf of our members, South East Councils Climate Change Alliance (SECCCA) is pleased to provide this response to changes in Minimum Standards for Rental Properties and Rooming Houses.

SECCCA represents nine local governments in the southeast of Melbourne and was established in 2004 to ensure that our communities remain productive and liveable with a safe and sustainable climate. All our member councils, with elected officials, have declared a climate emergency and are committed to reducing their own corporate emissions while supporting the wider community to take action to reach net zero emissions.

SECCCA's values are central to how SECCCA responds to the pressing needs of climate change. We are:

1. Committed to Community – to ensure a safe, equitable and thriving southeast Melbourne.
2. Act with Courage – difficult decisions need to be made now to drive down emissions. We act with the courage needed to give frank advice commensurate with the task at hand.
3. Evidence based – SECCCA bases decisions on evidence, which extends to climate science, economics, our own research and other credible agencies.

Our response seeks to provide further clarity and evidence from a local government and SECCCA perspective, to improve energy efficiency measures in rental properties. We offer the following observations and recommendations based upon our experience and work to date.

Ceiling Insulation

SECCCA is supportive of the proposed upgrading requirements for homes with no ceiling insulation present, to R5 from 30 October 2025. However, offer the following recommendations:

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| Recommendation 1 | Upgrades should not be only limited to homes with no insulation. Many homes have considerably less insulation than needed or has been poorly installed. All homes should be assessed for their current insulation levels and its effectiveness. Homes that fall short on installation standards and R5 minimum should require additional insulation to meet R5 requirement and comply with AS/NZS 4859 standard. |
| Recommendation 2 | Supportive of a pre-installation electrical safety check, rectification and certification of subsequent works. |
| Recommendation 3 | <p>The same level of verification and certification is also required for the installation of upgraded insulation. If the installed insulation is not checked and verified, the energy-saving and comfort benefits will not be realised and opens the market up to unscrupulous providers that may take advantage of the standards by providing substandard services.</p> <p>It is recommended that the Residential Efficiency Assessors trained under the Victorian Scorecard Program are trained and commissioned to undertake post insulation installation verification.</p> |

Electric Appliances

Phase out of gas appliances in all rental properties with the replacement of electric alternatives from the 30th of October 2025 is supported however;

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| Recommendation 4 | <p>There should not be an end-of-life option. It should occur from 30th October 2025 at the start of a new lease or at the conversion from a fixed to a casual rental agreement.</p> <p>This is for the safety/health reasons outlined below (draughtproofing). Cooktops and any other gas appliances used indoors also need to be phased out. Also, an end-of-life option may not align with emission reduction targets. The policy needs to be more proactive to ensure emissions reduction to achieve targets.</p> <p>Continue to provide subsidies through Solar Victoria and the Victorian Energy Upgrade program, along with support for green loans.</p> <p>With federal support, provide 'full or early depreciation' of appliance costs as a tax offset to reduce cost to landlords.</p> |
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Cooling Systems

From 30 October 2027, all rental properties are to have a fixed cooling system is supported with the stated appliance efficiency measures.

Draughtproofing

SECCCA is generally supportive of draughtproofing to occur from 30 October 2025, where there is a new rental agreement or conversion from fixed term to periodic rental agreement. Energy efficiency science clearly demonstrates that much of the benefits of insulation and double glazing is voided if draughtproofing is not adequate to keep conditioned air within the building envelope.

SECCCA in partnership with volume home builders have built several demonstration net-zero emission homes and worked with several new home buyers to replicate these homes. Based on this research and experience, it is critical that all homes (new or existing) undertake draughtproofing and are ventilated correctly. ([SECCCA Home Research Recommendations](#) – full report [Final Report Sept 2020](#))

There are four key risks affecting human health from poorly ventilated homes:

1. Any use of gas appliances will result in a build-up of carbon monoxide and dioxide affecting human health by contributing to asthma, particularly in children^{1 2}.
2. In the event of a gas leak, draughtproof homes will increase the risk of exposure which could result in serious human injury or death, particularly overnight when occupants are asleep.
3. A build-up of moisture/condensation on windows/frames, ceilings or any surface that results in the growth of mould. A well draughtproofed home, will result in mould generated by higher moisture levels from human breathing, cooking and showering.
4. General off gassing from products (such as carpet, appliances, paint etc) impacting human health causing lethargy and asthma³.

The way to manage these risks are:

- Only draughtproof a home once all appliances are electrified, and;
- Ensure adequate mechanical ventilation (including heat recovery)

The Regulatory Impact Statement (RIS) preferred Option 2 – Medium draught sealing measures assumes that the level of airtightness can be controlled. Without a test, as suggested in Option 4, no technical expert will be able to determine the level of airtightness. This increases the risk of over-tightening a home, resulting in air quality issues, or under-tightening and not achieving efficiency performance goals.

¹ 2021, Climate Council Australia, *Kicking the Gas Habit: How Gas is Harming our Health*, <https://www.climatecouncil.org.au/wp-content/uploads/2021/05/Kicking-the-Gas-Habit-How-Gas-is-Harming-our-Health.pdf>

² S. LeSon, S. Rosenthal. Associations between gas stove usage and childhood asthma symptoms, attacks, and ED visits among children in the 2020 Asthma Call-back Survey. 2024; <https://doi.org/10.1101/2024.06.04.24308398>

³ Maung TZ, Bishop JE, Holt E, Turner AM, Pfrang C. Indoor Air Pollution and the Health of Vulnerable Groups: A Systematic Review Focused on Particulate Matter (PM), Volatile Organic Compounds (VOCs) and Their Effects on Children and People with Pre-Existing Lung Disease. *International Journal of Environmental Research and Public Health*. 2022; 19(14):8752. <https://doi.org/10.3390/ijerph19148752>

In fact, there is minimum cost difference between option 2 and 3 and suggest both be completed for maximum impact. Option 4 is simply using a blower door test to trouble shoot and verify. Whichever the intervention, options 2 and 3 significantly increases risk of overtightening some homes. As such, mechanical ventilation is required in all.

Furthermore, in reference to the Regulatory Impact Statement:

- a. Noting that the RIS Options 1-4 relies upon data provide under a Sustainability Victoria (SV) report ‘Comprehensive Energy Efficiency Retrofits to Victorian Houses’ trial, with a small sample size (14 houses) that did not monitor air quality for moisture or gas build up post retrofit. Only temperature was recorded.
- b. .As per the SV report, *‘caution needs to be used when applying comprehensive draught sealing to houses. While draughts can be uncomfortable and increase heating and cooling costs, a minimum level of ventilation is required in houses to maintain a healthy indoor environment. The natural air leakage that occurs in houses helps to remove water vapour and other internal air contaminants from the room air. This includes smoke, odours from cooking and toilet areas, products of combustion from heating and cooking (e.g. carbon dioxide, sulphur dioxide and nitrogen dioxide), and fumes from paints and chemicals (e.g. volatile organic compounds) and formaldehyde emissions from furniture, carpet, finishes and building materials.’*
- c. The SV report only could survey 8 of the houses out of the 14 for occupant perceptions of the retrofits. There were clear energy and comfort benefits, however no questions were asked about air quality or moisture. Surveys look to be conducted not long after the retrofits, i.e. within 3-4 months as summer was not included. All reported the houses feel more comfortable and retain heat during winter. This suggests the draught sealing worked, meaning the houses are now at greater risk of poor indoor air quality, without means of regular ventilation.
- d. An occupant did report ‘retention of cooking odours after the draught sealing was an issue in one house.’ Which is of concern, if 1 in 8 houses identified cooking odours after the draught sealing as a concern then ventilation is required.
- e. While SECCCA has also not been able to conduct a research project itself to review air quality after draught sealing, we know from **anecdotal evidence that occupants reported draughtproof homes feeling stuffy, condensation on windows and frames and some mould growth (particularly in areas that are not often heated well eg. spare rooms and wardrobes).**
- f. Also, note that the air ventilation in a draught sealed homes must also factor in occupant behaviour, it is highly likely that some occupants will bring in standalone gas cooking appliances, unaware of the risks in a draughtproof home. An airtight home needs a fool proof method to ventilate safely against moisture and gas build up from fixed and mobile emission sources.
- g. The RIS also relies on the ‘Energy Efficiency Upgrade Potential of Existing Victorian Houses’ report which also points out the risks of airtight homes. However, in this study also the use of ventilation systems is not modelled.

We therefore recommend the following;

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| Recommendation 5 | <p>Draughtproofing can only occur in a home once all appliances have been electrified (noting the exemptions made in the RIS, Table 5.1 – <i>how many houses will not be exempt?</i> suggest that the majority of houses are still gas heated. This mean that those who are not exempt because they don't have gas will be penalised by having to draughtproof and there will be an incentive for landlords to keep gas so they won't have to draughtproof.</p> |
| Recommendation 6 | <p>To mitigate the air quality risks associated with draughtproofing, all draughtproof homes should be ventilated with a Heat Recovery Air Ventilation System. This system could be centralised or decentralised, providing the benefit of removing poor air quality from cooking, showering, breathing, material off-gassing and moisture, mobile gas appliances etc, while efficiency exchanging the heat to maintain energy savings and human health.</p> |
| Recommendation 7 | <p>Recommend consulting with ventilation experts to ensure the ventilation settings are right. SECCCA's recommendation is that draughtproof homes should met a minimum ventilation standard of:</p> <ol style="list-style-type: none"> a. An air ventilation rate of 1ACH every 2 hours using a mechanical heat recovery ventilation system. With a recovery of heat to 90+% in exchanged air and filtering of air to M5 / G4. b. Note, this stops short of SECCCA recommendation that new homes should achieve a measured building envelop airtightness value of less than 5ACH at 50pa of pressure under tests conditions. Which requires a Blower Door Test to verify. With the current draughtproofing specifications outlined, as per RIS 2 and 3 and with independent verification this level of airtightness / draughtproofing can be assumed slightly more-or-less. c. Before any policy is finalised a NVP and modelling should be conducted on Option 3 High level draught sealing measures, without a blower door test (inspection only) plus the addition of a Heat Recovery Air Ventilation System. d. Conduct trials to monitor air quality in draughtproofed homes. SECCCA has access to a number of these homes and may be able to assist with monitoring air quality with ventilation systems turned off and on. |
| Recommendation 8 | <p>It is recommended that the Residential Efficiency Assessors trained under the Victorian Scorecard Program are trained and commissioned to undertake post draughtproof installation verification.</p> <p>If the draughtproofing is not checked and verified the energy saving and comfort benefits will not be realised and open the</p> |

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| | market up to unscrupulous providers that will easily take advantage of the standards by providing substandard services. |
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The federal government [Your Home](#) recommends:

‘An airtight house with inadequate ventilation may lead to condensation, mould and high internal levels of carbon dioxide.’

‘There is no scientific agreement on when mechanical ventilation is required in a building. There is some consensus that if your home is achieving below 3 to 7 air changes per hour at 50 pascals (Pa) (known as ACH50), mechanical ventilation is definitely required. Find out more on measuring airtightness later in this chapter.’

Victoria’s temperate climate zones is classed as ‘high risk’ of condensation forming inside homes. <https://www.yourhome.gov.au/passive-design/condensation> Leading to mould issues and damage to structures.

SECCCA’s research demonstrated that airtightness could be improved to between 3-7 air exchanges per hour at 50pa by using the plaster as the air barrier. Of the 12 newly built homes that were assessed, where a builder was given guidance on how to draught seal a home, the average ACH under test conditions was 5.8ACH. With the highest ACH at 7.8ACH and the lowest at 2.3ACH.

All of these homes as per the ‘general consensus’ should install a mechanical heat recovery air ventilation system to keep the occupants safe from poor air quality and especially those that still use gas for cooking or heating.

SECCCA’s work can be benchmarked against work undertaken by the [CSIRO - 5 Star Energy Efficiency Standard for Residential Buildings 2013](#) that found the average home with a 5 star standard had an air exchange of 19.7ACH with a variance of 33.88ACH at the high end and 8.07ACH at the low end.

The training and guidance given to the builders of the new homes in SECCCA’s study is the same that would be expected for the draughtproofing technicians for existing housing stock under the proposed new standards. Therefore, running a real risk that a governments intervention to draughtproof a home to save energy will, in fact lead to homes that require mechanical ventilation to keep air quality safe.

On the other hand, if the draughtproofing of homes through revised standards are inadequate to achieve a high level of airtightness, then the energy efficiency gains won’t be realised.

To strike a balance between these two competing objectives is not practicable or achievable, without blow door testing every home and adjusting draughtproofing measures to ensure approx. 10ACH (which is still only probably safe, in terms of enough ventilation). Which is not a higher enough level of draughtproofing to maximise efficiency benefits.

In short, policymakers have two clear choices:

1. Draughtproof as tight as possible using known techniques and ventilate right with a heat recovery mechanical ventilation system; or
2. Avoid draughtproofing homes (beyond obvious unacceptable areas of air leaks, Option 1 in the Regulatory Impact Statement (RIS), however voiding any real energy efficiency benefits).

Mandatory Disclosure

The onus should not be on the rental occupant to have to understand all the energy efficiency requirements of a rental property. They should be offered with a simple and easy to understand rating scale that verifies ‘this rental property complies with minimum government standards’, similar to the star rating used in electrical and water appliances. These star rating systems are widely used and understood in purchasing decisions.

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| Recommendation 9 | <p>Mandatory disclosure requirement and performance-based standards based on the Residential Scorecard for all rental properties, starting from 1st Jan 2025.</p> <p>Mandatory disclosure and minimum standards should not be limited to investment properties they should be applied across all residential dwellings, along with minimum standards that increase in line with emission reduction targets.</p> |
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The **Residential Efficiency Scorecard**, is a proven robust household energy efficiency star rating system that can provide an assessment of the efficiency of a home. This program could be easily adapted to check and verify efficiency measures pre and/or post work completed by landlords and/or their agents.

The suggested rental efficiency measures should be assessed in light of the Scorecard to determine a ‘minimum star rating of residential homes’. There should be a mandatory disclosure requirement for all rentals from the introduction of the new efficiency measures. This will give renters a simple understanding of compliance from an independent assessor, as opposed to reliance on the landlord or their agents.

Landlords require transparency and certainty from government regarding mandatory disclosure of energy efficiency and future new minimum standards. It is SECCCA’s view the rental standards don’t go far enough and if more standards are to be adopted in the future a pathway should be set out now. As opposed to a drip feed of new standards that are certain to increase in the future, with an uncertainty about when they will end.

A clear pathway to lift these minimum standards, in line with emission reduction target requirements to meet net zero by 2045, is needed (28-33% by 2025. 45-50% by 2030. 75-80% by 2035 and net zero by 2045 as per Victorian govt. targets). With full disclosure of when the

minimum standards will be lifted again. This is needed for rental properties and all existing residential homes.

For example, with the current changes suggested, it is likely that homes will achieve a 6-7 star rating under the Scorecard. With one further minimum standard, the addition of solar to all rentals (where possible), the star rating will lift to 8-10 stars. This minimum standard could be set to lift in 2028. Noting that the installation of solar is the single most effective measure to reduce emissions and cost to households with attractive paybacks.

This would effectively address the majority of residential carbon emissions by 2028, with the final emissions sources dealt with by energy generators transitioning to renewables.

An Renewable Energy and Energy Efficiency Roadmap for residential homes could look like this, to align with targets:

| Standard | Application | Timeframe |
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| Mandatory Disclosure, using VRES | At Point of Sale or Lease | 2024-2025 |
| Minimum Standard 6 Stars VRES | At Point of Sale or Lease | 2025-2028 |
| Minimum Standard 9 Stars VRES (will require solar or GreenPower (in the absence of roof suitability)) | At Point of Sale or Lease | 2028-2035 |
| Mandatory Disclosure and 9+ Stars | All homes | 2030-2035 |
| Net Zero Emissions | Residential Sector | 2035 |

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| Recommendation 10 | <p>Develop a residential renewable energy and energy efficiency pathway to next zero by 2035. To provide transparency and certainty of how and when residential emissions will be reduced.</p> <p>Include solar as a mandatory key emissions reduction measure.</p> |
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Air Extraction

In many homes the exhaust fans in bathrooms and above cooktops simply don't work and often exhaust into the roof space or back into the room via a filter. The current use of the black plastic Draftstoppa is not adequate.

Air extraction for bathrooms and toilets must be upgraded to ventilate out of the roof space (not in, in line with the NCC) and meet 800 m³/hr of extraction performance. Air extraction for kitchen rangehoods must be upgraded to ventilate out of the roof space (not in) and meet 1600 m³/hr of extraction performance.

Any performance less than this results in excess moisture build up with a home and odours, contributing to mould and poor air quality.

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| Recommendation 11 | Air extraction upgrade requirements in bathrooms and kitchen cooktops to outside and as per minimum performance specifications (800m ³ /hr bathrooms/toilets and 1600m ³ /hr kitchens) |
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Independent Verification

To reduce the verification burden, systems could be established that require photos of all works completed by installers (similar to solar requirements for rebates) and submitted as part of the certification process.

Quality Control Assessors (also could be completed by Victorian Residential Scorecard Assessors) only need to undertake regular spot checks (e.g. 1 in 10 jobs) of certified installers with a requirement that if defective work is found that all work completed over the past period (10 jobs) are to be assessed at the cost of the installer and any defects rectified. The alternative being that all jobs are assessed.

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| Recommendation 12 | To ensure residential efficiency standards are being met, establish Quality Control Officers to assess the quality of work. Suggest using the VRES assessors who are already trained in energy efficiency. |
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Risk Management

A risk management framework is needed to assess energy efficiency measures to ensure the options are able to adequately meet the efficiency objectives and maintain human health.

SECCCA recommends that the government introduces energy efficiency measures that are not 'half baked'. Homes in Australia are poorly built in terms of their energy efficiency. As a result, homes are leaky enough to offer a natural air exchange that removes the build-up of carbon dioxide from gas appliances, off gassing from materials and moisture, thereby lessening the impact of gas appliances on human health. However, once draughtproofing is improved, unintended health outcomes will occur. It is critical that these changes in air quality are addressed.

It is likely that it will take a number of years before the health impacts are realised of not ventilating draughtproofed homes correctly. A critical step is to phase out gas appliances prior to draughtproofing and good ventilation must be installed to avoid moisture issues.

It is recommended that if the government does not address the ventilation issue that will be caused by draughtproofing homes, then draughtproofing should not be mandated due to the affects on human health. The alternative is to keep homes more inefficient to avoid the capital costs of ventilation correctly and invest these funds into renewable energy generation through roof top solar.

SECCCA's recommendation is to draughtproof, ventilate correctly and require adequate solar generation however, this is an alternative outcome that balances affordability with acceptable health and carbon reduction outcomes.

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| Recommendation 12 | A Risk Management Framework needs to be adopted and underpin the policy decisions made relating to energy efficiency. These should be disclosed to give understanding of each consideration |
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Installer Qualifications

All installers should be required to be trained and certified under the relevant AS/NZS standard (if not already) to undertake any home efficiency works. Like other licenced trades to ensure compliance, health and safety as well as real energy / carbon emission reduction similar standards should be met. This will ensure that unskilled workers don't enter the workforce putting the objectives of the changes at risk.

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| Recommendation 13 | Establish clear qualifications, certification and verification requirements for installers, technicians and trades. Require certifications to be disclosed on business websites and listed on government websites as approved, certified by the government. |
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Thank you for the opportunity to provide a response to the increasing residential efficiency standards for rental properties. SECCCA welcomes any further opportunity to provide clarification on discussion as needed and can provide a full presentation of its research findings.

Sincerely,



Helen Steel
CEO, SECCCA

On behalf of SECCCA member councils:

- Bass Coast Shire Council
- Bayside City Council
- Cardinia Shire Council
- City of Casey
- Greater Dandenong City Council
- Frankston City Council
- Mornington Peninsula Shire Council
- City of Kingston
- City of Port Phillip

This submission has been approved through the SECCCA governance structures but may not have been formally considered by individual members. The submission does not necessarily represent the views of all members.