

25 June 2025

The Secretary to the Committee
C/- Parliament House
GPO Box 572
ADELAIDE SA 5001

Via email: scrtbill@parliament.sa.gov.au

Dear Secretary

Re: Residential Tenancies (Minimum Standards) Amendment Bill 2024

The Green Building Council of Australia (GBCA) welcomes the opportunity to provide feedback on the Residential Tenancies (Minimum Standards) Amendment Bill 2024 (the Bill). We commend the South Australian Government on this step towards ensuring that renters have safe and habitable living arrangements. Everyone should have a comfortable, healthy home.

The introduction of minimum standards for rental properties has been well-documented internationally and these policies, when well designed and enforced, have been an important part of improving housing stock in those countries. GBCA has also provided input to proposed changes in minimum standards for rentals in the ACT and Victoria. In South Australia, this is a critical step that will contribute to the health of renters and assist renting households to affordably maintain safe, liveable indoor temperatures year-round. It will also contribute to the decarbonisation of South Australia's built environment.

GBCA's purpose is to lead the sustainable transformation of the built environment. We do this primarily through our core functions:

- We advocate policies and programs that support our vision and purpose.
- We educate industry, government practitioners and decision-makers, and promote green building programs, technologies, design practices and operations.
- We collaborate with our members and other stakeholders to achieve our mission and strategic objectives.
- We rate the sustainability of buildings, fitouts and communities through Australia's largest national, voluntary, holistic rating system – Green Star.

Green Star is Australia's most widely used sustainability rating system for the design, construction and performance of buildings – including social infrastructure – fitouts and communities. Green Star aims to transform the built environment by:

- reducing the impact of climate change
- enhancing our health and quality of life
- restoring and protecting our planet's biodiversity and ecosystems
- driving resilient outcomes for buildings, fitouts, and communities
- contributing to market transformation and a sustainable economy.

In [Every Building Counts: For state and territory governments](#),¹ GBCA and the Property Council of Australia make a set of recommendations for government action that will accelerate an equitable transition to a decarbonised built environment and net zero economy. **Recommendation 4.3** is to ‘**Support renters with minimum performance standards for rental homes**’. Please see comments regarding several of the Bill’s proposed standards below. In addition, we urge the South Australian Government to carefully consider how compliance will be enforced and exemptions applied:

- **Compliance:** Minimum standards can only be effective with proper enforcement of compliance. We encourage the South Australian Government to look to other jurisdictions, including internationally, to understand the most effective methods for ensuring compliance. For example, in New Zealand where landlords must demonstrate their rental property’s compliance with the Healthy Homes Standards, with a compliance statement.² Real estate agents are also an important component in the compliance framework in their role of enabling leasing arrangements and management of rental properties.
- **Exemptions:** It will be important that in considering any proposed exemptions, that no loopholes are left to allow/encourage non-compliance. Clear guidance should be provided on how properties would meet eligibility criteria for exemptions. We note that while it is fair to include exemptions where costs of installation can be demonstrated to be unreasonable, but the parameters of what is fair and reasonable should be well understood and regularly updated by the agency responsible for compliance. We also note that any potential exemptions based on the cost of efficiency upgrades should not apply where issues such as unsafe wiring and/or asbestos have been uncovered during preinstallation checks.

Requirements for appliances, fittings and fixtures

GBCA supports the implementation of minimum energy and water standards for appliances, fittings and fixtures.

Water use: We encourage the South Australian Government to consider whether the requirements set out at Part 2 of the Bill should be set higher (3 star WELS proposed). Water efficient fixtures and fittings are readily available and will help households to manage water use. This leads to lower household water use and bills as well as contributing to lower potable water use for South Australia overall. We note that South Australia has been experiencing drought conditions with parts of the state with lowest rainfall on record.³

While we recognise that Green Star Buildings is a voluntary rating tool with benchmarks that reflect industry best practice, we provide the WELS ratings specified for all fixtures and water-using appliances in the Green Star Buildings rating tool here as a guide. All fixtures and water-using appliances installed within the project’s scope must, at a minimum, meet the following WELS ratings:

Fixture type	WELS rating
• Taps	• 5 star
• Urinals	• 5 star
• Toilets	• 4 star
• Showers	• 3 star
• Clothes washing machine	• 4 star
• Dishwashers	• 5 star

¹ https://www.propertycouncil.com.au/wp-content/uploads/2023/12/GBCA_EBC-StateandTerritory-2023-PolicyDoc_FA_18Aug_Digital_LR-6.pdf

² <https://www.tenancy.govt.nz/healthy-homes/compliance-statement/>

³

<http://www.bom.gov.au/climate/maps/rainfall/?variable=rainfall&map=decile&period=6month®ion=nat&year=2025&month=04&day=30>

We also note that water fixtures and fittings can often operate effectively, if not always efficiently, for many years. In addition to requiring that any replacements of fixtures and fittings due to end of life or renovation must meet minimum standard, the South Australian Government could also consider setting a requirement that flow controllers (that meet a specified WELS star rating) should be installed in existing fixtures and fittings where appropriate. This could be a requirement for all rental properties before a new lease is commenced, with a date set by which all rental properties must comply (i.e. as set out in Clause 68B of the Bill).

Energy efficiency: Similarly, GBCA urges the South Australian Government to consider whether a 2 star rating for electric appliances, as captured in the table at Part 2, is a sufficiently high standard to drive meaningful outcomes for rental households and overall energy efficiency gains.

Additionally, GBCA notes that hot water heating systems are not included in the Bill. Together with space heating, these appliances typically represent the highest portion of household energy use. It is critical that renters are protected from high energy bills as much as possible by ensuring that every time one of these vital appliances requires replacement, it meets a reasonable standard of energy efficiency.

Heating and cooling

GBCA supports the introduction of a minimum standard which requires rental properties to have a fixed heater and cooler, ideally a reverse cycle air conditioner, in the main living area of a rental property (at the end of life in the case of an existing appliance, and at the start of a new lease in the case of no existing appliance and no later than 30 November in any other case as set out in Clause 68B of the Bill). It is vital that all South Australian households are able to ensure a healthy indoor temperature year-round. The proposed standards will help to ensure that renters have the means to effectively heat or cool at least one room in the house as a safe and comfortable refuge in hot or cold weather.

Insulation and draught proofing

Insulation: GBCA commends the South Australian Government for setting a requirement (Part 4, 6 (1)) that;

“premises must at least comply with the minimum insulation levels (total R value) for roofs specified by the BCA Volume Two as in force on the commencement of this Schedule, according to the location of the premises and other building features.

***Note** - BCA Volume Two provides detailed descriptions of the insulation requirements for each climate zone (as defined by the National Construction Code).

However, there is a future opportunity to consider the implications of the 10-year pause on updates to the National Construction Code in South Australia. We note that as temperatures and energy costs continue to rise in the coming years, rental homes in South Australia will still only be required to be insulated to the standard in place today.

Draught proofing: GBCA supports the proposed draught proofing standards as an important measure in contributing to occupant health and comfort. It is easier to maintain a comfortable temperature in a well-sealed home, supporting greater energy efficiency and lower energy bills. It is estimated that more than 25% of heat loss in winter is caused by draughts.⁴ Draught-proofing a home through better airtightness is one of the most significant ways to reduce energy use by preventing this heat loss. When combined, good insulation and airtightness can save homes up to 40% in energy bills every year.⁵

⁴ Dee J. and EnergySmart South Australia. 2017. The 10 step guide to reducing your energy bills.
<https://energysmartsaver.com.au/>

⁵ Ibid.

Windows – coverings: GBCA notes that if window coverings are going to be required, then requiring that these should be thermally efficient window coverings will contribute towards greater health and comfort for tenants as well as supporting lower energy bills.

Windows – flyscreens: GBCA supports this measure in the interests of achieving benefits for health, comfort and safety, while contributing to lower energy bills. Where flyscreens are fitted, tenants are more likely to be able to use natural ventilation to cool and ventilate their home with greater safety and comfort.

Ventilation

Proper ventilation is critical in safeguarding the health of building occupants. All rental homes must be able to demonstrate adequate ventilation in all habitable rooms, including the kitchen, bathroom, shower, toilet and laundry. This may mean installing mechanical ventilation where adequate natural ventilation is not available/likely.

Transition to all-electric homes

We note that installation of gas space heaters is explicitly disallowed by the Bill and commend this requirement. We urge the South Australian Government to consider phasing out gas stoves and gas hot water heating systems at end-of-life with an explicit requirement to replace with an efficient, all-electric appliance. Transitioning to electric alternatives would help protect renters from the health impacts associated with gas cooktops as well as realising the long-term cost benefits associated with a fully electrified home.

To arrange further discussion, or for additional clarification of the points made above, please do not hesitate to contact Katy Dean, Senior Policy Adviser, via email at katy.dean@gbca.org.au.

Yours sincerely

A handwritten signature in dark ink, appearing to read 'D. Rooney', with a stylized flourish at the end.

Davina Rooney
Chief Executive
Green Building Council of Australia