

12 June 2026

Tasmania Department of Justice

Via email: haveyoursay@justice.tas.gov.au

Dear Consumer Building and Occupational Services business unit

Re: Modernising the Residential Tenancy Act

The Green Building Council of Australia (GBCA) welcomes the opportunity to provide feedback on the *Modernising the Residential Tenancy Act* consultation paper. GBCA supports introducing mandatory minimum energy efficiency standards for rental properties in Tasmania. GBCA believes all Australians should live in homes that are healthy, comfortable, and resilient to a changing climate.

This submission focuses on **section 5.1: minimum standards for energy efficiency**.

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 contributed to proposed reforms to minimum rental standards in the ACT, South Australia, Victoria and New South Wales.

For Tasmania, implementing minimum energy efficiency rental standards is a critical step that will contribute to the wellbeing of occupants and assist households to affordably maintain safe, liveable indoor temperatures. To do this the standards should, at a minimum, cover heating and cooling, ventilation, draught stopping and insulation.

Green Building Council Australia

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. We provide policy advice and practical pathways to improve sustainability, resilience and building performance.

Minimum energy efficiency rental standards

The Act should be amended to introduce strengthened, enforceable minimum rental standards. Tasmania relies on general habitability standards, with no explicit insulation or thermal performance requirements, in contrast to the ACT (mandatory ceiling insulation) and Victoria's forthcoming minimum energy efficiency standards.

Current minimum rental standards are limited to requiring that rental dwellings are weatherproof and structurally sound, in good repair, properly ventilated and have heating available. This is not enough to ensure a healthy comfortable house – minimum energy efficient features including insulation, or an energy efficiency standard should be added.

Poor energy efficiency in homes can lead to several issues, including unaffordable energy bills, homes are too hot in summer and too cold in winter, persistent mould and negative health and wellbeing impacts.

In [Every Building Counts: For state and territory governments](#), GBCA and the Property Council of Australia recommend supporting renters through minimum performance standards (recommendation 4.3).

Comparable approaches include:

- Victoria - New standards require landlords to install ceiling insulation (minimum R5) where none exists, provide energy-efficient heating and cooling systems, upgrade hot water and showerheads, and undertake draught-proofing of doors, windows and vents, with obligations generally triggered at the start of new leases or when systems reach end-of-life¹
- New Zealand – Healthy Homes Standards require landlords to meet specific, enforceable criteria across heating, insulation, ventilation, moisture ingress and drainage, and draught stopping and mandatory ceiling and underfloor insulation to prescribed R-values based on climate zones²
- The United Kingdom – Minimum standards require most privately rented homes in England and Wales to meet a minimum Energy Performance Certificate (EPC) rating. Landlords can choose how to comply but will often require improvements to insulation, heating systems, or glazing upgrades. The standard will increase over time.³

While the incidence of the cost of these changes can be unclear, these kinds of changes can be expected to add more benefits than costs. Upgrade costs are modest relative to property values and rents and are unlikely to reduce housing supply.

Electrification and energy efficiency are complementary and improve comfort, health and emissions outcomes. GBCA has released a practical guide specifically focused on retrofitting existing buildings to be all-electric: [A practical guide to electrification for existing buildings](#).

To arrange further discussion, or for additional clarification of the points made above, please do not hesitate to contact Corwin Wallens, Policy Manager, via email at corwin.wallens@gbca.org.au.

Yours sincerely



Davina Rooney
Chief Executive
Green Building Council of Australia

¹ [New minimum energy efficiency standards - Consumer Affairs Victoria](#)

² [Rental properties and healthy homes standards | New Zealand Government](#)

³ [Domestic private rented property: minimum energy efficiency standard - landlord guidance - GOV.UK](#)