

Insulation Australasia

Submission on the regulations for Rental Housing Victoria

Insulation Australasia supports the “New Regulations for rental housing”

Based on experience in energy assessment and the installation of insulation Rental housing in Victoria is of a lower standard than owner occupied dwellings this is a result of the problem of the benefit of upgrades being in favour of the tenant rather than the landlord.

Regulating the minimum standards for rental accommodation will aid the low income, elderly, children, and disabled persons. Cold and damp homes rental homes result in negative social outcomes. Health effects include respiratory and cardio vascular conditions.

Damp and cold homes are associated with toxic reactions, allergies, pneumonia and asthma.

There is strong international evidence that effective heating insulation and ventilation can directly reduce illness. Healthy homes increase school and work attendance, mental health, subjective well being and comfort. Reduced health care costs.

The measures proposed will improve rental accommodation but we submit that this will be a sub-optimal solution.

In an average sized uninsulated home about 30-35 percent of the heat loss is through the ceiling and the floor. Without adequate insulation to retain heat the rental properties will be cold and mouldy and the tenant will be paying excessive charges for energy consumed to reach a comfortable temperature. Low income tenants will be unable to afford to run the installed heaters. There will be increased carbon emissions and air pollution from tenants heating uninsulated homes.

Ceiling and under floor insulation can be easily retrofitted as many rental properties have accessible roof and underfloor spaces. Insulation must be well installed and maintained, otherwise it will not perform to the required performance standard. (10% of gaps in ceiling insulation can reduce the R value by 50%)

Insulation Australia recommends a minimum of R3.0 in the ceiling and R1.5 under the floor. This will be cost effective level of insulation for most climate zones in Victoria.

Landlords should be responsible for inspecting insulation and providing a certificate of conformance of installed insulation to the required R values and in accordance with AS3999. Landlords to be responsible for replacing retrofitting or topping up insulation so it achieves the required installed R values.

Exceptions could be made for properties which will be on the rental market for less than 12 months, properties which will be subject to demolishing or rebuild within 12 months. Houses or areas of houses where there is no or limited access that makes the installation

unsafe or would cause damage to the building. Areas of buildings which are directly below or above habitable spaces. Concrete slab floors. Outbuildings and garages.

Landlords to allow installers to undertake minimum work such as removing barge boards to provide access to underfloor or install a manhole to access a pitched roof.

The New Zealand Government has successfully implemented the minimum standard for Insulation in rental properties from 2016 to 2019 with a reported 98% compliance rate.

Insulation Australasia would be pleased to assist in the addition of Insulation to the minimum standards for Insulation in Rental premises.

References

<https://www.hud.govt.nz/residential-housing/healthy-rental-homes/healthy-homes-standards/>

<https://www.tenancy.govt.nz/maintenance-and-inspections/insulation/compulsory-insulation/>