



Smoke Alarm Association Australia Ltd  
[REDACTED]

Rental Reforms  
Engage Victoria  
Department of Justice and Community Safety  
Melbourne  
VIC 3001

12<sup>th</sup> December 2019

Dear Sir/Madam

**RE: PROPOSED RESIDENTIAL TENANCIES REGULATION 2020**

The Victorian Government's recent updates to the Residential Tenancies Act (RTA 1997), and in particular the creation of Regulations to inform the application of the Act have come to the attention of Smoke Alarm Association of Australia (SAAA).

We are the peak body for the Smoke Alarm Industry Australia wide and we are well respected within the real estate community Australia wide and take the topic of Smoke Alarm legislative requirements very seriously to ensure the ultimate outcomes for all involved are fair and reasonable and above all provide the best application of safety possible for the relevant stakeholders.

Whilst the SAAA greatly welcomes the addition of activities to be conducted for the Victorian rental space, we see some fundamentals that need to be addressed in the wording of the proposed changes to ensure the best possible protection for occupants and property, whilst maintaining integrity in the workmanship and tradespeople that conduct the work. All concerned would like to avoid the pitfalls of the past "insulation scheme" debacle and ensure suitably qualified people complete this work.

We believed this can be achieved through some minor additions that create consistency with other Safety Related Activities required by the Regulations. In particular, proposed Schedule 3 (Regulation 13) – Safety Related Activities of the Draft Residential Tenancy Regulations 2019. Specifically, Part 3 – **Smoke Alarm Safety Activities**.

It is noted that Regulation 13 is included in various proposed Forms contained in other Schedules to this draft. It is envisaged that the suggestions made below would also be applied throughout all Forms as required.



**Suggestions:**

1. Two additional points (d) and (e) to be added under item (1)
  - (d) Smoke Alarm/s must be replaced on or before their expiry time frame of 10 years;
  - (e) All work to be carried out by a suitably qualified person and maintenance, repairs and installations recorded in accordance with manufacturer or relevant governing body requirements.

The Association see the above 2 points as imperative to ensure correctly working Smoke Alarms are installed and operational, and that all work is completed by appropriately experienced and/or qualified people who understand the Victorian Building Associations full requirements for installation locations and manufacturers specifications for testing and maintenance. Further, this wording would also confirm that only electricians are permitted to replace hard-wired 240 volt Smoke Alarms.

2. Item 2 be amended in two parts as follows:
  - by removing the words "by the renter" and amending what follows with "that it/they is/are not in working order". This removes the restriction of whom provides the information to the rental provider.
  - A second paragraph added to item (2) as follows: "All work to be carried out by a suitably qualified person and maintenance, repairs and installations recorded in accordance with manufacturer or relevant governing bodies requirements."

This maintains consistency with the points above and should be applied for the same reasons.

Again, we commend the Victorian Government for making the initiative of Smoke Alarm safety a priority in the new Regulations and trust the experience and knowledge of our Association will assist in their appropriate development.

Yours sincerely

**The Smoke Alarm Association of Australia**



**Harid Changizi**

**Chairman of the Board/President**