

# Submission to Infrastructure Victoria's draft 30-year infrastructure strategy

April 2025



# Contents

Introduction .....	2
About RACV.....	2
RACV plays its part in a cleaner energy future.....	2
Response to the draft strategy.....	3
1. Improved transport choice and mobility .....	5
Accessible infrastructure (draft recommendation 6) .....	5
Build safe cycling networks in Melbourne and regional cities (draft recommendation 15).....	6
2. Safer roads .....	8
30km/h school speed zones (draft recommendation 14) .....	8
Strengthening the strategy to make our roads safer .....	9
3. Road pricing reform .....	10
Charge people fairly to use roads (future option) .....	10
4. Adapting to climate change .....	11
Using new flood maps (draft recommendation 28).....	11
Climate change is increasing the frequency and severity of floods.....	11
Resilient roads .....	11
Home batteries and virtual power plants (draft recommendation 31).....	12
Speed up household energy efficiency and electrification (draft recommendation 34) .....	12
What consumers tell us .....	12

# Introduction

RACV welcomes the opportunity to respond to Infrastructure Victoria's draft 30-year infrastructure strategy.

## About RACV

RACV is proud to provide exceptional experiences for our members and customers through a range of products and services across motoring and mobility, home, energy and leisure. These include Emergency Roadside Assistance, Motor Insurance, Home Insurance, Home Trades and an increasing range of options in the cleaner energy space, such as RACV Solar. In addition, RACV has ten Club and Resort properties across Australia and a range of domestic and international holiday packages, tours and cruises from our trusted travel partners.

RACV represents over 2.2 million members and has a proud history of supporting improved outcomes for all Victorians.

Helping Victorians is at the heart of RACV. Last year, RACV:

- provided 1.2 million members with motor insurance policies
- covered 1.6 million members for Emergency Roadside Assist
- responded to 700,000 Emergency Roadside Assist call outs
- had over 140,000 downloads of Arevo, RACV's journey planning mobility app for cyclists and motorists
- provided 898,000 members with home insurance policies; and
- assisted with 52,000 home emergencies through Emergency Home Assist.

This means RACV is in a Victorian home every six minutes.

## RACV plays its part in a cleaner energy future

RACV is committed to helping Australians transition to a cleaner energy future. Through several investments RACV now can help all Australians make this transition and save on energy costs. We offer cleaner energy products and services including solar panels and batteries through RACV Solar and a home retail energy offering in Victoria through Arcline by RACV.

RACV Solar is now one of the largest installers of solar power, both commercial and residential, on the east coast of Australia and is one of the largest installers of home batteries in Victoria. RACV is an electric vehicle charger network operator with locations at RACV Clubs and resorts and public locations across Victoria. RACV has also invested in electric vehicle charging companies JET Charge and Chargefox. Our team of electricians, engineers and project managers design, install and support commercial and residential EV charging infrastructure and provide integrated energy solutions for homeowners, fleet operators and businesses.

RACV delivers expert and tailored commercial energy solutions to help businesses save on energy costs, improve energy resiliency and reliability, reach renewable energy goals, unlock additional revenue streams and maximise return on assets through the energy markets.

In 2025, RACV has launched a new product for commercial and industrial customers following our successful installation of one of Australia's first VPPs of its kind at RACV's Torquay and Inverloch resorts. RACV's own VPP is one of the first to participate in the very-fast Frequency Control Ancillary Services (FCAS) market managed by the energy market operator. This followed the ARENA-supported AEMO Virtual Power Plant Demonstration Project in 2022.

By installing a Virtual Power Plant at our resorts, we have been able to realise a range of commercial benefits such as managing energy costs and generating revenue, at the same time as contributing to grid stability by feeding energy back into the grid during periods of high demand.

Delivered in collaboration with PowerSync Technologies and aggregates over one megawatt of battery capacity from the Torquay and Inverloch resorts – the storage equivalent of approximately 20 average electric vehicle batteries.

## Response to the draft strategy

RACV recognises the important contribution Infrastructure Victoria continues to make towards a safer, healthier, productive and more liveable Victoria. The draft strategy is an opportunity to engage with the community on important issues and to hear from different perspectives across a broad range of themes.

RACV has taken the opportunity to respond in a targeted way to Infrastructure Victoria's recommendations and this submission is structured on the following themes:

1. Improved transport choice and mobility.
2. Safer roads.
3. Road pricing reform.
4. Adapting to climate change.

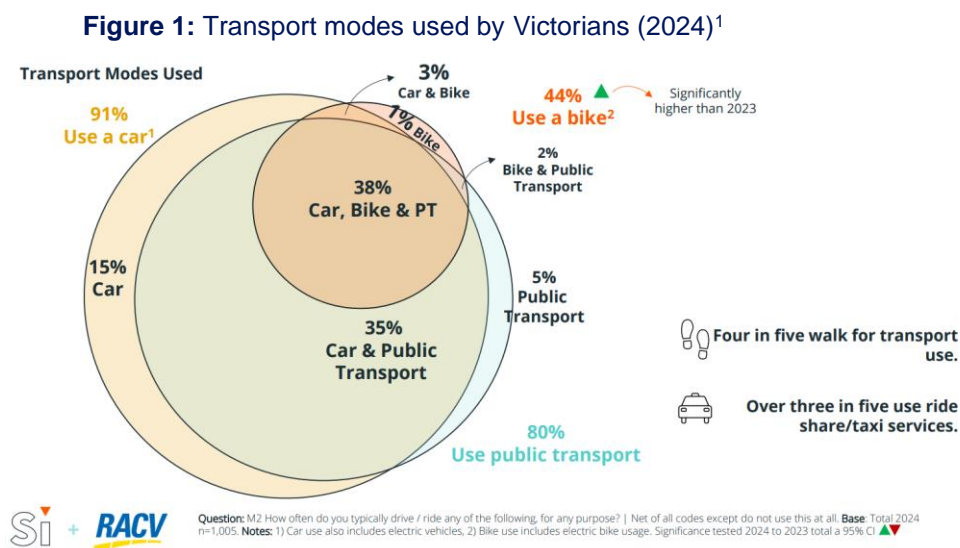
RACV's response to the draft strategy:

<b>Make government infrastructure more accessible</b> (Draft recommendation 6)	RACV supports this recommendation
<b>30km/h school speed zones</b> (Draft recommendation 14)	RACV will confirm its position on this recommendation after the Victorian Government undertakes a robust regulatory impact statement and comprehensive community engagement.
<b>RACV recommendation: road maintenance and upgrades</b>	RACV encourages Infrastructure Victoria to strengthen safer roads in the 30-year strategy by taking into account road maintenance and upgrades to existing infrastructure. Greater investment in safer roads should also be supported by increased transparency about the current conditions of our roads.
<b>Build safe cycling networks in Melbourne and regional cities</b> (Draft recommendation 15)	RACV supports this recommendation and has provided Bike Superhighways to Infrastructure Victoria as a starting point.
<b>Use new flood maps to revise planning schemes</b> (Draft recommendation 28)	RACV supports this recommendation
<b>RACV recommendation: roads to be rebuilt to higher standards when they have been impacted by extreme weather events or are in a high-risk area.</b>	RACV encourages Infrastructure Victoria to include in the 30-year strategy the need for roads to be built to the highest standards following an extreme weather event, or where roads are located in high-risk areas.
<b>Invest in home, neighbourhood and big batteries for more energy storage</b> (Draft recommendation 31)	RACV supports this recommendation

<b>Speed up household energy efficiency and electrification</b> (Draft recommendation 34)	RACV supports this recommendation
<b>Future option: Charge people fairly to use roads</b>	RACV supports this future option in principle and calls on the Commonwealth to commit to a full review of the national land transport network, policies, planning and funding.

# 1. Improved transport choice and mobility

RACV research demonstrates that most Victorians are multi-modal and use a mix of transport modes to get around. Figure 1 illustrates the 2024 research findings that while the motor car remains the leading form of transport, 80 per cent of Victorians use public transport, 44 per cent use a bike and 38 per cent of Victorians use a mix of car, public transport and bike riding to get around. Four in five Victorians walk for all or some of their transport journeys. Over three in five use ride share/taxi services.



Given this mix of transport modes, RACV supports initiatives that provide greater transport mobility and improved transport choice. RACV seeks outcomes that result in Victorians arriving safely to their destination, no matter what mode of transport they choose. When planning transport network investment, the Victorian Government should have a customer focus and take into consideration connectivity and responding to where people are living in a growing city.

RACV further recognises that there are significant health, sustainability and affordability outcomes linked to active transport. We therefore support recommendations that help Victorians to get around conveniently, affordably and safely. Specifically, public transport needs to be safe, reliable and efficient, and accessible for people with a disability; while strategic investment in separated bike infrastructure is overdue. Further investment in public transport and bike riding infrastructure will encourage safer and more active transport choices, while relieving congestion for Victorians who choose to drive.

## Accessible infrastructure (draft recommendation 6)

Infrastructure Victoria has proposed that the Victorian Government completes priority public transport stop upgrades to meet legal accessibility requirements and fund further upgrades.

RACV supports this recommendation.

The Victorian Government should continue to invest in Melbourne's tram network, including funding for low-floor trams and accessible platforms.

<sup>1</sup> RACV Sentiment Policy Research (2024).

Victorians who require mobility aids are unable to access tram services unless trams have a low-floor design and the tram stop is accessible. Melbourne's tram network has over 1,600 stops, of which only 450 are accessible.<sup>2</sup> A number of tram routes in Melbourne have no accessible tram stops whatsoever, while others have a mix of tram stop designs but an insufficient number of low-floor trams servicing those routes. This limits the reliability of using trams as a transport choice for people with mobility aids. RACV encourages the prioritisation of the Victorian Government's existing commitment to meet its obligations to provide a more accessible tram network.

Tram stop upgrades are also an opportunity for governments to consider the safe interaction of tram users, motorists and bike riders. More than 75 per cent of Melbourne's tram network operates in streets shared with other traffic, resulting in about 1,000 vehicle-to-tram collisions every year.<sup>3</sup> While Government has not released recent data, there were 2,632 near misses recorded between motorists and alighting tram passengers in 2021.<sup>4</sup>

Careful thought needs to be given to the safe design of tram stops and how tram users interact with motorists. Trams should have priority in mixed traffic and – where feasible – physical separation from other traffic.

## Build safe cycling networks in Melbourne and regional cities (draft recommendation 15)

Infrastructure Victoria has proposed that the Victorian Government continues to build protected and connected cycle corridors across Victoria, and to publish updates to the strategic cycling corridor network.

RACV supports this recommendation.

Victorians are discouraged from active transport options unless they feel protected by the infrastructure they use.<sup>5</sup> Therefore, roads and bike infrastructure should be designed and funded to protect active transport users. Improved infrastructure will better protect existing vulnerable road users, and encourage others to make active, healthy and sustainable mode choices, reducing congestion for people who choose to drive.

The principal design aim of safer roads for vulnerable road users should be to separate cyclists and e-scooter riders from motorists as much as possible.

With bike riding deaths in Victoria up 71 per cent on last year,<sup>6</sup> RACV is calling on governments to improve road safety for people who ride bikes by rolling out more protected bike lanes in strategic corridors across Melbourne.

To support targeted and strategic investment in separated bike infrastructure, RACV has identified bike riding corridors that rank as a high return for investment by governments. These corridors, also known as Bike Superhighways, reflect evidence-based modelling that takes into consideration post-pandemic travel trends, catchment area demand, recent bike infrastructure improvements and the growing uptake of e-bikes.

Figure 2 illustrates the Bike Superhighway corridors.<sup>7</sup> These high-priority corridors include:

- Coburg to CBD
- Essendon to CBD
- Port Melbourne to CBD
- Windsor to Yarra River.

<sup>2</sup> Victorian Department of Transport and Planning, *Melbourne's Tram Plan*, 2023, page 6.

<sup>3</sup> Victorian Department of Transport and Planning, *Melbourne's Tram Plan*, 2023, page 14.

<sup>4</sup> Premier of Victoria, *When a Tram Stops, You Stop* media release, 2022: [When A Tram Stops, You Stop | Premier](#).

<sup>5</sup> RACV Sentiment Policy Research (2024).

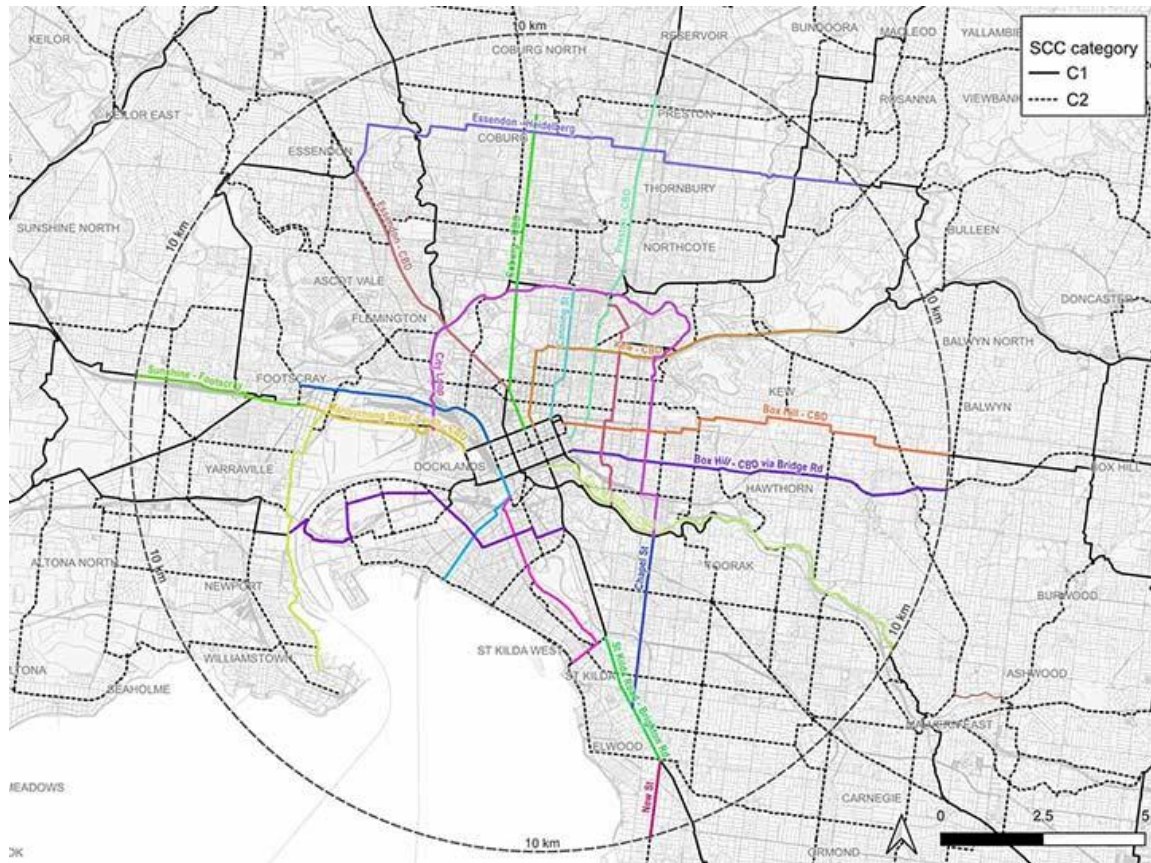
<sup>6</sup> TAC Live Lost data: <https://www.tac.vic.gov.au/road-safety/statistics/lives-lost-year-to-date>

<sup>7</sup> More information about the RACV Bike Superhighways can be accessed here: <https://www.racv.com.au/cars-transport/road-safety/improving-roads-transport.html#identifyingopportunitiesforbikecorridorinvestment>



These routes represent Melbourne's most utilised bike riding corridors, particularly for commuter traffic, but also rank among the most dangerous for bike riders.

**Figure 2: RACV Bike Superhighway**



To increase active transport participation, reduce congestion and promote wider health and sustainability benefits, the Government needs to be strategic about where and how active transport infrastructure investment is made, and adopting a network approach with trunk routes is preferable to underfunded, piecemeal or disconnected upgrades.

RACV commends the Bike Superhighways to Infrastructure Victoria. These corridors are a starting point for targeted investment in bike infrastructure where there is the highest demand and the greatest risk to road safety.

In addition to increased funding for strategic infrastructure that separates bikes from cars, RACV recommends that in the finalised 30-year strategy, Infrastructure Victoria include the following:

- Start measuring the Government's performance against, and commitment to, increasing Victoria's active transport mode share to 25 per cent by 2030.
- Improve business case evaluations by developing a robust economic value for mode shift from cars to riding and walking, capturing health, environmental and congestion benefits.
- Improve processes to review and approve road design solutions to ensure they are safe for vulnerable road users, particularly in relation to intersection safety.



## 2. Safer roads

Around seven children aged 0 to 15 die each year on Victorian roads.<sup>8</sup> Children are at risk around roads because they are less visible, have a reduced ability to judge time, speed and distance, and often act without thinking. Lowering speeds where interactions between motorists and vulnerable road users – such as children during school drop off and pick up times – will reduce the likelihood and consequence of a collision.

Likewise, Victoria has seen a decline in the number of children walking to school over the past 50 years, and according to VicHealth,<sup>9</sup> 45 per cent of students walked to school in 1974, dropping to around 20 per cent today.

However, we know from our research that the majority of Victorians support status quo speed zones. RACV research consistently indicates that current default speed zones of 50km/h in residential areas and 40km/h in school zones is 'felt to be about right' by a majority of Victorians (at 75 per cent and 78 per cent respectively).<sup>10</sup> This suggests that any broad-based reduction of speed zones in Victoria will require a compelling safety narrative and support from a wide range of community stakeholders.

### 30km/h school speed zones (draft recommendation 14)

Infrastructure Victoria has proposed that the Victorian Government reduce speed limits to 30km/h on local streets, starting in places that children often visit including around schools, playgrounds, childcare centres and kindergartens.

RACV will confirm its position on this recommendation after the Victorian Government undertakes a robust regulatory impact statement and comprehensive community engagement.

RACV agrees that local streets should be safe for children. RACV welcomes the government engaging with the community about the benefits and disadvantages of lowering school speed zones to 30km/h and expanding school speed zones to playgrounds, childcare centres and kindergartens. From a physiological perspective, there is clear evidence that the human body has a substantially higher chance of survival in a collision with a vehicle travelling at 30km/h compared to a vehicle travelling at 40km/h or higher.

However, further consideration needs to be given to the impact of lowering school speed zones on travel times, traffic flow and community standards and expectations; and whether the scale of the current problem warrants the broad-based approach to lowering speeds. There is a risk that, unless the government brings the community along on the journey towards 30km/h school speed zones and makes a cogent and compelling case that addresses these broader issues, respect and integrity of the law will be diminished. It is important that the government does not over-reach on school speed zones to the extent that general compliance with speed limits across all road types is undermined.

The government should publish improved data about school zone fatalities and serious injuries.

Until government has undertaken a comprehensive regulatory impact statement on the proposal, RACV continues to support 40km/h school speed zones. School speed zones should be supported by increased compliance and enforcement.

<sup>8</sup> TAC: <https://www.tac.vic.gov.au/road-safety/road-users/parents>

<sup>9</sup> VicHealth: <https://www.vichealth.vic.gov.au/sites/default/files/lts-more-than-just-walking-publication-final-Aug07.pdf>

<sup>10</sup> RACV Sentiment Policy Research (2024).

Furthermore, safer speeds can be achieved in a number of ways. There are a range of other road safety interventions that can and should be implemented regardless of whether 30km/h school speed zones are introduced or expanded. These include:

- High-visibility signage, including electronic variable speed signs.
- Upgraded pedestrian crossings.
- Traffic calming infrastructure.
- Removing school entry and exit points from main roads (where relevant).
- Driver education about driving safely around children.

## Strengthening the strategy to make our roads safer

Maintaining the state's existing road network should be front-and-centre of Infrastructure Victoria's strategy. It is essential that the Government's infrastructure agenda should not just focus on new projects and initiatives but ensure that existing road infrastructure is adequately funded and maintained. Our existing roads are becoming less safe at the expense of other government priorities, and this is putting the lives of motorists and other roads users at risk.

In the finalised 30-year strategy, Infrastructure Victoria has an opportunity to prioritise investment in roads and road maintenance, particularly in regional Victoria. Government road maintenance funding, including road resurfacing and rehabilitation budgets, are about a tenth of what they were prior to the Victorian floods of 2022. We have not seen a return to critical road maintenance programming and funding, despite government announcements to that effect.

RACV's 2024 My Country Road campaign<sup>11</sup> highlighted that improving road surfaces is a top priority Victorians. Based on a survey of 7,000 participants, RACV found that potholes and poor road conditions are the top road safety issues identified, with an overwhelming 64 per cent of participants identifying these as the primary safety issue; up from 46 per cent in the 2021 survey.

RACV encourages Infrastructure Victoria to strengthen safer roads in the 30-year strategy by taking into account road maintenance and upgrades to existing infrastructure. Greater investment in safer roads should also be supported by increased transparency about the current conditions of our roads. Government regularly audits and rates the safety of the state's main roads (known as AusRAP data) but that information is not made public. This level of secrecy about the standard of our roads reduces transparency and may undermine confidence in the integrity of government if funding decisions are not clearly linked to roads that are the most dangerous or under funded.

As a starting point for strengthening road maintenance and upgrades in the 30-year strategy, RACV therefore invites Infrastructure Victoria to take into consideration the following positions:

- The Victorian Government should invest in regional road maintenance and upgrades, with safety as a priority.
- The Victorian Government should invest in upgrading metropolitan intersections, again with safety as a priority.
- On roads with dangerous levels of potholes and rough or broken surfaces, governments should prioritise resurfacing those roads rather than setting semi-permanent speed reductions.
- RACV calls on the Victorian Government to release AusRAP data for all roads that have been rated for safety in Victoria. RACV wants to see major roads improved to a minimum of 3-stars (AusRAP) safety rating on existing sections, and a minimum of 4-stars (AusRAP) on new sections.

<sup>11</sup> RACV My Country Road (2024): <https://www.racv.com.au/royalauto/news/my-country-road-survey-results-2024.html>

### 3. Road pricing reform

#### Charge people fairly to use roads (future option)

As a future option for consideration, Infrastructure Victoria has proposed that the Victorian Government work with the Commonwealth on road pricing options. Infrastructure Victoria has recommended the introduction of road charges that help manage congestion and improve productivity, and to consider options such as car parking levies, off-peak freeway tolls, congestion pricing trials, or road user charging for all motorists with lowered fixed road charges.

RACV supports this future option in principle.

Rather than adopt piecemeal interventions to tackle diminishing fuel excise revenue and congestion and traffic management challenges, RACV joins the Australian Automobile Association (AAA) in calling on the Commonwealth to commit to a full review of the national land transport network, policies, planning and funding.

This review should include:

- Setting a strategic national framework around land transport policy and infrastructure, ensuring that all investment delivers value to the Australian community.
- Developing a long-term national plan for land transport tax reform, including a review of all motoring taxes and charges with a view to replacing them with a technology-neutral road user charge.
- Determining how best to fund and support local government to sustainably plan, design, deliver and maintain vital road links, particularly in regional locations.

Given the Commonwealth's responsibility collecting excise revenue, and the need for a co-ordinated national approach to fairer road pricing, RACV agrees that Victoria should not undertake road pricing reform on its own. Within the context of broader national reform, the Victorian Government has an opportunity to leverage any future pricing reform to tackle congestion and traffic management challenges.

## 4. Adapting to climate change

### Using new flood maps (draft recommendation 28)

To strengthen Victoria's resilience to climate change and other future risks, Infrastructure Victoria has proposed that the Victorian Government revise planning schemes with updated flood maps. This proposed reform includes:

- Producing a common set of flood projections based on the latest climate data.
- Using this information to update flood studies and maps and applying them in planning schemes.
- Minimising building in areas at high risk of flooding.

RACV supports this recommendation.

RACV supports the development of a common set of flood projections, flood studies and maps. This information should be available to property buyers so they are aware of extreme weather risks so they can make an informed choice.

RACV joins the AAA in calling for roads to be rebuilt to higher standards when they have been impacted by extreme weather events or are in a high-risk area.

### Climate change is increasing the frequency and severity of floods

Flood risk poses a significant threat to communities and households, impacting both physical infrastructure and the well-being of residents. Floods can cause extensive damage to homes, disrupt essential services, and lead to long-term economic and social challenges. CSIRO<sup>12</sup> report an increase in the intensity of heavy rainfall events in Australia of around 10 per cent in recent decades, these events are becoming more intense and frequent. Flood is Australia's most costly and rapidly growing extreme weather risk<sup>13</sup>

RACV notes that the Victorian Government, in its response to the *Legislative Council Environment and Planning Committee Inquiry into the 2022 flood event in Victoria*, stated that:

- consideration will be given to amending the *Sale of Land Act 1962* to improve natural hazard risk information provided to prospective property purchasers.
- it would review flood studies every five years and update them every 10 years.
- rental providers would be required to provide information to prospective renters on flood risk and disclose previous flooding as part of the rental application process.

It is crucial that information about flood risk is available to the Victorian community to inform decision-making and preparedness.

### Resilient roads

RACV joins the AAA in calling for roads to be built to the highest standards available pre- and post-severe weather events to provide a future resilient and safe road network. There are suitable innovative waterproof products available for roads; however, it is their lack of use, plus insufficient/ low-quality road assets that mean resilience cannot be addressed. For example, to avoid flooding during a flood event, roads need to have high quality culverts

<sup>12</sup> CSIRO, State of the Climate 2024

<sup>13</sup> Insurance Council of Australia, Advancing Australia's Resilience, 2025

and drainage. Without these types of road asset considerations, implementing flood resistant bitumen in isolation will not be effective.

To deliver high quality weather- and disaster-resilient roads and transport assets, these issues require consideration collectively:

- maintenance and upgrade costs, and their associated lifespan
- current transport asset conditions
- road safety requirements
- locations and their propensity for disasters, including severe weather events and whether the road has been identified as an evacuation route
- traffic congestion
- nature of road use (e.g., damage from high truck use)
- population growth.<sup>14</sup>

It is essential that the Victorian Government captures transport and road safety data to assist in understanding transport resilience patterns and trends, and to model possible future resilience and infrastructure readiness. This will assist in planning to ensure transport infrastructure is able to withstand the impacts of severe weather events as much as possible.

## Home batteries and virtual power plants (draft recommendation 31)

To support a stable renewable energy supply, Infrastructure Victoria has proposed that the Victorian Government extend support for home batteries, past the Solar Battery Loans program end in 2025 and provide new incentives for people to join a virtual power plant.

RACV supports this recommendation.

Home batteries can store energy and supply households with power when they need it, can provide blackout protection during a power outage and reduce reliance on the grid, driving down energy bills. Virtual power plants bring a community-wide benefit providing back up power and stabilising the electricity grid.

## Speed up household energy efficiency and electrification (draft recommendation 34)

Infrastructure Victoria is proposing energy efficient electric space heating and hot water systems when people replace their appliances at end-of-life, and support for low-income households to go all-electric. As well as completing social housing energy upgrades, including electrification and requiring homeowners to disclose the energy efficiency of their homes at the time of sale or lease.

RACV supports this recommendation.

## What consumers tell us

Renters are increasingly facing housing affordability stress with rents increasing 10-12% pa over the past few years. Renters now spend an average of 33 per cent of their income on rent (52 per cent for low-income earners).<sup>15</sup> Around 50-55 per cent of renters in Melbourne live in an apartment.

<sup>14</sup> Australian Road Research Board, *Best Practice Advice on the Use of Recycled Materials in Road and Rail Infrastructure*.

<sup>15</sup> See [ANZ CoreLogic Housing Affordability Report 2024](#)

Residential buildings are responsible for around 24 per cent of overall electricity use in Australia.<sup>16</sup> Renters spend approximately eight per cent more on electricity than otherwise similar households.<sup>17</sup> RACV sought to understand the experiences of renters and rental providers. According to 2024 RACV Research, competition for properties, low vacancy rates, rising rent and cost of living have left renters feeling disempowered when it comes to property choice.

The short standard tenancy (12 months) and concerns of needing to move (due to rent rises or notice being given) all drive the growing sense of insecurity. However, of those surveyed, renting is not short term. Two in three expect to be renting for at least the next five years.

Nearly two thirds of renters told us raising issues/repairs means the rent could go up and that they could be seen as difficult. This is confirmed by rental providers. Of those surveyed, 43 per cent of rental providers agreed they would increase rents if tenants raised a lot of issues/repairs. Almost two thirds of rental providers said they would increase the rent to keep up with what is required for the property to meet minimum standards.

Seventy-two per cent of renters surveyed stated they are connected to gas. Sixty-four per cent of renters indicated their property can be kept comfortably warm or cool in extreme temperatures – this is consistent with findings from Sustainability Victoria<sup>18</sup>. This contrasts with 88 per cent of rental providers. This shows the lived experience of renters in the home varies from the perception of rental providers.

Research from Sustainability Victoria finds that compared to homeowners, renters and those in public housing have significantly fewer energy-efficient appliances and are likely to have poorer thermal comfort. These groups are more likely to have to leave their home because it was too hot or too cold, compared to homeowners.<sup>19</sup>

According to 2024 RACV Sentiment Research, of those surveyed, cost remains the biggest motivator and barrier to energy efficient homes. Nearly one third of Victorians are not aware of any energy efficiency programs.

RACV supports the introduction of mandatory disclosure of home energy performance ratings at point of sale and/or lease. Noting this program has begun on a voluntary basis in New South Wales this year.

If the new energy efficiency and electrification standards and energy performance ratings are introduced, improving the communication between renters and rental providers and strengthening the Residential Rental Agreement will be critical. The *Victorian Government Response to the Legislative Council Environment and Planning Committee Inquiry into the 2022 flood event in Victoria January 2025* states the Victorian Government may also introduce a requirement for rental providers to provide information on flood risk and mandatory disclosure of previous flood to prospective renters (where known) as part of the rental application process.

In the current environment, there are significant gaps in enforcement of existing minimum standards and with the introduction of new mandatory requirements, Government will need to introduce an appropriate audit and enforcement regime by expanding and resourcing Consumer Affairs Victoria (or other Government agency) to determine if minimum and/or building electrification standards have been met and the disclosure is accurate.

<sup>16</sup> See [Department of Climate Change, Energy, the Environment and Water](#)

<sup>17</sup> Effects of renting on household energy expenditure: Evidence from Australia; Burke, Paul; Australian National University; Crawford School of Public Policy; May 2022

<sup>18</sup> State of Sustainability Report 2023, Sustainability Victoria

<sup>19</sup> State of Sustainability Report 2023, Sustainability Victoria