Submission to the City and Environment Directorate

Discussion Paper: Future Appliance Regulations to Support the Gas Transition

16 September 2026

The Conservation Council ACT Region is the peak body for environment and climate groups in the ACT Region. We represent close to 50 member groups, bringing together a united voice on environment and climate issues to Government, business and community.

Since 1981 we have been at the centre of the region's most important wins for wildlife, bushland, climate and communities. As a hub for the ACT Region's environment and climate movement and a not-for-profit, non government organisation, we run campaigns, promote and upskill local groups, undertake research, advocate passionately, and engage and inform our community.

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Executive Summary

The Conservation Council of the ACT Region (the Conservation Council) thanks the City and Environment Directorate for the opportunity to comment on future appliance regulations to support the gas transition. The Conservation Council strongly supports a just transition off fossil fuel gas in the ACT and the regulation of gas appliances, with some considerations set out below.

The Conservation Council considers that an accelerated transition away from fossil fuel gas is needed to support rapid emissions reduction in the ACT. The ACT Government declared a climate emergency in 2019 and has since missed its legislated emissions reduction target of a 50 to 60% reduction by 2025, with additional targets of a 65 to 75% reduction by 2030 and 90 to 95% by 2040 still ahead. These targets will not be met unless we take significant action to rapidly transition away from fossil fuel use.

As set out in our submission on the ACT Government's *Developing the next Climate Change Strategy for the ACT* Discussion Paper, the Conservation Council is advocating for the gas phase-out to be brought forward five years to 2035, which appliance regulation would directly support.

Delaying regulations has a cost. Around one third of gas-connected households in the ACT are expected to have their largest gas appliance fail between 2026 and 2031, and every new gas appliance installed during that window can be expected to lock in emissions for a decade or more.

Shifting from gas to efficient electric appliances, powered by renewable energy, is one of the most effective tools available to rapidly cut the ACT's emissions and reduce household energy costs. While the predominately consumer-led approach to the electrification of appliances in the ACT to date has made an impact on reducing emissions, voluntary adoption can be expected to hit a structural wall, leaving vulnerable groups such as renters, low-income households and apartment dwellers at risk of being left behind in the transition. This is why regulation is urgently needed.

On this basis, the Conservation Council recommends that the ACT Government:

- **Prohibit the installation of new gas appliances and the replacement of a gas appliance with another gas appliance, by regulating what licensed gas fitters may install; paired with tradesperson training and advisory support**
- **Introduce minimum standards for rental properties requiring efficient electric replacement at end of life**
- **Commence regulations as soon as possible, and no later than the end of 2027**
- **Cover residential, commercial and industrial users, and both Type-A and Type-B appliances**
- **Speed up the electrification of public housing to deliver on the ACT Government's commitment to electrify all feasible public and community housing by 2030**
- **As a partial owner of the ActewAGL, require ActewAGL to immediately stop the advertisement and promotion of gas appliances**
- **Reduce the costs of voluntary gas network disconnection and abolishment, particularly for low-income and vulnerable households**

- **Ensure a just transition for gas workers by funding trade sector training and an industry information campaign to support regulations**

The Conservation Council notes that incentives sit outside the scope of this consultation, and considers this a significant limitation. Regulation designed without a government backed funding commitment will place undue burden on those least able to comply — renters, apartment dwellers and lower income households who will be left behind and bear the costs of an ageing gas network.

While existing support programs such as the Sustainable Household Scheme and the Access to Electric program have provided some financial incentives for electrification, eligibility for these programs needs to be expanded beyond home-owners and low-income households to reach those currently experiencing financial stress with increased cost of living. The Government should also introduce direct funding support (i.e grants) for electrification for additional vulnerable groups. For instance, financially stressed households often earn too much to access lower income supports, but too little to comfortably take on loans. Similarly, many community organisations fall within this gap and do not qualify for existing government supports.

Lastly, any regulation should be supported by clear public education and communications regarding the phaseout, led by the Government in partnership with community organisations.

What are the reasons for regulation? (Chapter 1)

1 - Which factors (consumer protection, an uneven transition, reducing emissions and/or providing regulatory certainty) do you think should be prioritised in the gas transition? Are there other factors which should be considered?

Reducing emissions and addressing the uneven transition should be prioritised together. Fossil gas is still the ACT's second-largest source of emissions, at 17.6% of the Territory's total in 2024-25.[1] The ACT has already missed its legislated target of a 50 to 60% reduction by 2025, and the recent fall in gas use may only reflect early movers who have voluntarily adopted electric appliances.[2] On that basis, the gas phase-out should be brought forward to 2035, which appliance regulation would directly support.

Equity belongs in the same tier of priority. Renters, low-income households and people in multi-unit buildings have the least capacity to act on their own,[3] and as the gas network shrinks its fixed costs will fall on the customers who are left.

2 - Do you think any factors (consumer protection, an uneven transition, reducing emissions and/or providing regulatory certainty) are sufficiently addressed by current action? If so, please provide details.

None of the four factors are sufficiently addressed by current action, although some progress has been made. For example, regulation to prevent new gas connections was introduced in 2023,[4] and the ACT Government's commitment to electrify all feasible public and community housing by 2030 was approximately 45% complete by March 2026.[5] Existing programs have made a genuine difference for some households, however, there are a number of vulnerable groups still facing significant barriers to transition away from gas appliances. With only four years to go, the Conservation Council recommends the ACT Government prioritise and speed up the electrification of public and community housing in order to fully deliver on their stated commitment.

An uneven transition that disadvantages renters, low-income earners and apartment dwellers is a highly likely possibility without strong regulation and supported by expanded

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[1] ACT Government, *ACT Greenhouse Gas Inventory Report for 2024-25* (ACT Government, 2025), 11 , accessed August 17, 2026, https://www.parliament.act.gov.au/__data/assets/pdf_file/0007/2998798/List_ACT-Greenhouse-Gas-Inventory-Report-for-2024-25.pdf.

[2] ACT Government, *Future Appliance Regulations to Support the Gas Transition* (ACT Government, 2026), 19, accessed August 24, 2026, https://www.climatechoices.act.gov.au/__data/assets/pdf_file/0016/3090013/Future-Gas-Appliance-Regulation-Discussion-Paper.pdf.

[3] ACTCOSS, *Supporting a Fair, Fast and Inclusive Energy Transition in the ACT* (ACTCOSS, 2023).

[4] ACT Government, "Preventing New Gas Network Connections," ACT Government, accessed August 24, 2026, https://www.climatechoices.act.gov.au/energy/canberras-electrification-pathway/preventing-new-gas-network-connections.

[5] ACT Government, *Future Appliance Regulations to Support the Gas Transition*, 6,13.

Government incentives. For example, renters still have no say over the appliances they pay to run, with an ACT Government consultation on minimum rental standards showing that 77.8% of tenants supported replacing gas appliances with electric at end of life compared with only 31.5% of landlords.[6]

Similarly, in the approximately 18,500 units in the ACT served by centralised gas hot water, electrification would require an owners corporation to pass a resolution, which the consultation paper acknowledges can be difficult where the electric option costs more upfront.[7]

On reducing emissions, the ACT missed its 2025 interim emissions reduction target and new gas cooking and hot water appliances continue to be installed,[8] which suggests current policy settings are not moving at the pace required.

Which gas users could regulations support to transition? (Chapter 2)

3 - Is there a particular category of gas user (Residential, Commercial or Industrial) that should be the focus of regulation?

Regulation should focus on all three categories, with residential users addressed first, noting that residential users account for 98% of connections and 59% of gas consumed.[9] Individuals living in rental properties, multi-unit buildings and low-income households have the least capacity to act on their own, and as other customers leave the gas network they are likely to be the ones left carrying a growing share of its fixed costs.

However, regulations for commercial and industrial users should not be delayed. Commercial users are the furthest behind in the electrification transition, with only 40% intending to halve their gas use by 2045 and just one in five holding a plan to disconnect.[10] This statistic indicates that commercial users are unlikely to transition without regulation.

4 - How do you think regulation can support groups who face complex barriers to electrify (such as renters, small businesses, and people living in multi-unit apartments)?

Regulation is the tool most likely to reach groups facing complex barriers to electrify.

Existing policy settings and programs have done little to resolve the fundamental tension of the ‘split incentive’ in the rental market: the person who pays for an electrification upgrade is not the person who benefits from it. Landlords bear the upfront cost while tenants see lower

[6] ACT Government, *Future Appliance Regulations to Support the Gas Transition*, 18.
[7] ACT Government, *Future Appliance Regulations to Support the Gas Transition*, 23.
[8] ACT Government, *Future Appliance Regulations to Support the Gas Transition*, 26.
[9] ACT Government, *Future Appliance Regulations to Support the Gas Transition*, 21.
[10] ACT Government, *Future Appliance Regulations to Support the Gas Transition*, 21, 24.

bills and better living conditions, a dynamic that produces inaction. Few renters are confident their landlord will act without being compelled.

A minimum rental standard that requires an electric replacement when a gas hot water system or heater fails avoids this issue. Victoria is introducing a similar minimum rental standard from March 2027, specifying that when a gas system fails, it must be replaced with a heat pump water heater, or an efficient electric reverse cycle unit.[11] Energy Consumers Australia has recommended that similar standards are needed across all jurisdictions. The ACT is now at risk of falling behind other states, with Victorian landlords facing the requirement within months while the ACT is still deciding whether to regulate at all.

In multi-unit buildings a significant barrier is collective decision-making. Regulation assists by limiting what can go in when a shared system is replaced, so the building only has to work out when and how to electrify. Requiring an electrification plan would also let it save through the sinking fund over several years, instead of facing a sudden special levy when gas services are withdrawn.[12]

However, regulation on its own will not be enough. The Conservation Council considers Government incentives are also required, including direct funding support for electrification for vulnerable households.[13]

Which appliances could be included in future regulation? (Chapter 3)

5 - Should regulation focus only on small appliances that are mostly used by the residential and small business sectors (Type-A appliances), or should large commercial appliances also be considered (Type-B appliances)?

Regulation should cover both types of appliances, with Type-A sequenced first. Type-A appliances include everyday appliances found in homes and small businesses, such as space heaters, hot water systems and cooktops. These make up the overwhelming majority of gas appliances in the ACT and efficient electric replacements are available for nearly all of them.[14]

Type-B appliances are the larger or custom-built systems used in commercial and industrial settings, such as boilers, furnaces and coffee roasters. These should not be deferred on grounds of technical difficulty, as the Government's own commissioned assessment found that 93% of Type-B appliances in the ACT are ‘straightforward to electrify or electrifiable with

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[11] Victoria State Government, “New Electrification and Efficiency Standards and Regulations for Victorian Buildings.”
[12] ACT Government, *Future Appliance Regulations to Support the Gas Transition*, 24.
[13] Conservation Council ACT Region, *Submission to the City and Environment Directorate: Developing the next ACT Climate Change Strategy* (2026), accessed August 24, 2026, https://conservationcouncil.org.au/wp-content/uploads/CCACT-Submission-on-Developing-the-next-Climate-Strategy-for-the-ACT.pdf.
[14] ACT Government, *Future Appliance Regulations to Support the Gas Transition*, 26–27.

minor difficulty',[15] while the remainder can come off the network through bottled gas or liquid fuels.[16]

6 - Are there particular appliance uses, such as space heating, water heating or cooking, which should be the focus of regulation?

Space heating and water heating should be the priority focus of regulation. Space heating accounts for approximately 75-80% of ACT gas consumption, and water heating represents the largest stock of appliances requiring replacement.[17] Efficient electric alternatives are well established for both. In practice, regulation could mean prohibiting licensed gas fitters from installing new or replacement gas space heating and hot water systems, so that a household replacing a failed appliance moves to a heat pump hot water system or a reverse cycle system instead.

Cooking should not be excluded, however. It is a small share of household gas use, but the Government's own licence data shows new gas cooking and instant hot water appliances are predominantly what continues to be installed in the ACT.[18] Restrictions on new installations should therefore extend to cooking, even if requirements to replace existing cooking appliances follow later. Gas cooktops are also a significant source of indoor nitrogen dioxide, with associated respiratory risk for children and older people.[19]

7 - Are there any appliance uses, such as space heating, water heating or cooking, which should not be considered for regulation?

No.

Approaches to regulation (Chapter 4)

8 - Which regulatory approaches (restrictions on new/replacement gas appliances, rental standards, information at point of sale etc.), if any, would you support to meet the next steps in the gas transition?

The ACT Government should prioritise introducing restrictions on new and replacement gas appliances alongside new minimum rental standards, supported by information measures on the network phase-out.

The fastest and most effective approach to transition off gas appliances is to prohibit licensed gas fitters from installing new gas appliances or replacing one gas appliance with another. This regulatory approach avoids issues that may arise from a sales ban on gas appliances, which would be difficult to enforce across shops and state borders. However, restrictions on installation must be paired with tradesperson training and advisory support from the Government. The ACT Government should provide adequate and timely

[15] ACT Government, *Future Appliance Regulations to Support the Gas Transition*, 24, 27.
[16] ACT Government, *Future Appliance Regulations to Support the Gas Transition*, 27.
[17] ACT Government, *Future Appliance Regulations to Support the Gas Transition*, 28.
[18] ACT Government, *Future Appliance Regulations to Support the Gas Transition*, 26.
[19] Ben Ewald et al., "Health Risks from Indoor Gas Appliances," *Australian Journal of General Practice* 51, no. 12 (2022): 935–38, https://doi.org/10.31128/AJGP-08-22-6535.

information to gas fitters working in the ACT regarding their legal obligations before any regulations came into force, and should offer financial incentives to encourage retraining and upskilling in the installation of electrical appliances. In the interim period before such regulations came into force, tradespeople should be required to inform customers at the point of gas appliance work that gas appliances are being phased out. Mandatory information requirements for retailers and distributors on the gas network phase-out would also cohesively support this.

Minimum rental standards that require an efficient electric replacement when a gas appliance fails or reaches end of life should be introduced as a priority, as they are the most effective regulatory approach for advancing electrification in the rental sector. Renters face a structural disadvantage in the gas transition. They have no say over the appliances they pay to run, and bear the ongoing costs of operating those appliances and maintaining a gas connection. In addition, tenants lack confidence in their landlords to act without being compelled to do so - an issue that minimum rental standards for gas appliances would overcome. The ACT already applies a similar principle to ceiling insulation in rental properties, establishing a precedent for this type of minimum standard. Victoria is now introducing a comparable standard for gas appliances from 1 March 2027, requiring that when a fixed gas heater or gas hot water system permanently breaks down and cannot be repaired, it must be replaced with an energy-efficient electric alternative, such as a reverse-cycle air conditioner or heat pump hot water system.

9 - Do you think a particular regulatory approach should be prioritised over another?

Restrictions on the installation of new and replacement gas appliances and minimum rental standards requiring replacement of a gas appliance with an electric alternative at end of life should be prioritised together. Restrictions on installation are the most direct means of preventing further investment in gas appliance assets that will become stranded and that would otherwise lock in emissions for a decade or more. Emissions from the ACT's gas network fell 13.5% in 2023-24 and a further 10% in 2024-25, showing how quickly emissions fall as households come off gas, and every gas appliance installed now delays that shift by another decade.[20]

10 - Are there any specific regulatory approaches that you have concerns with? What actions could help minimise these concerns?

The Conservation Council is concerned with the proposed possible exemption for centralised gas heating or hot water systems in multi-unit buildings.[21] Whilst the electrification of such systems in multi-unit buildings may be more expensive and technically complex, exempting such building types effectively postpones the difficulty of electrification rather than resolving it. Multi-unit buildings will still have to electrify before the gas network shuts off, only later and with less time to prepare. This risks leaving apartment dwellers financially worse off and ending up paying more when the work finally has to happen.

[20] ACT Government, *Future Appliance Regulations to Support the Gas Transition*, 21.
[21] ACT Government, *Future Appliance Regulations to Support the Gas Transition*, 40.

The ACT Government's Integrated Energy Plan has committed to deliver a retrofit readiness program to help apartment buildings develop an electrification plan, as well as a review of unit title legislation to ensure it is fit for purpose to enable electrification.[22] Both should be funded and delivered alongside the regulations, so they enable the change instead of excusing it. Where an exemption from regulation is genuinely needed, it should be granted case by case on demonstrated grounds, so it does not settle into a permanent loophole.

Timeframes for regulation (Chapter 5)

11 - What factors influence the time it takes to replace gas appliances with electric, rather than like-for-like appliance replacement? How much time would this generally be expected to add?

N/A

12 - Are there other approaches you would like considered for regulating appliances which might support the next steps in the gas transition?

There is a gap in the paper around regulations to support owner-occupiers with operational gas appliances to transition off gas beyond existing loan programs. For instance, owners selling a property could be required to disclose the property's gas appliances and the fact that they will need to be replaced before the network is decommissioned, similar to the way in which the energy efficiency rating is already disclosed. Renovation also offers a similar opportunity for home owners. For instance, an approved renovation that alters a room containing a gas appliance could require that appliance to be removed and be replaced with an efficient electric alternative.[23]

13 - What timeframe do you consider to be appropriate for regulations to come into effect?

Regulations should commence as soon as possible, and no later than the end of 2027. Every year of delay allows more gas appliances to be installed that will not reach end of life before their section of the network is withdrawn. Timing is crucial because approximately a third of gas-connected households in the ACT are expected to have their largest gas appliance fail between 2026 and 2031,[24] so many replacement decisions will be made before any later start date takes effect.

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[22] ACT Government, *Future Appliance Regulations to Support the Gas Transition*, 24.
[23] Conservation Council ACT Region, *Submission to ACT Government Integrated Energy Policy: Regulation to Prevent New Gas Connections in the ACT* (Conservation Council ACT Region, 2023), 3.
[24] ACT Government, *Future Appliance Regulations to Support the Gas Transition*, 26.

14 - If restrictions on installing certain types of gas appliances were implemented, should the regulations be phased in over time (such as hot water appliances from X date, and space heating from Y), or should regulations be commenced at once?

Restrictions should all commence on the same date. Phasing them in by appliance type would mean gas heaters could still go in lawfully after gas hot water systems were restricted, and with such systems eventually becoming a stranded asset the regulation was meant to prevent. It would also leave consumers, tradespersons and retailers working out which appliances are covered this year and which are covered next.

The start date of restrictions should be announced well in advance and supported by clear public messaging, education and communications to ensure all households, installers and retailers are well aware of their responsibilities. Information on which parts of the network are becoming unviable and when they are likely to be withdrawn should be published as it becomes available.

Future gas network decommissioning (Chapter 6)

15 - What information would you find most helpful if your property was in a section of the gas network that was to be decommissioned?

N/A

16 - How long would you consider to be a reasonable period to make any necessary arrangements after being notified that the gas network service will be withdrawn in your area?

N/A

17 - What is a reasonable period that must pass before a disconnected gas connection, can no longer be reconnected / reinstated (e.g. 2, 3 or 5 years of no use).

N/A

Other considerations for gas appliance regulation (Chapter 7)

18 - Are there particular circumstances which would warrant an exemption/s from gas appliance regulations? What would the impact be of those exemptions not being allowed?

As noted in response to question 10, exemptions should be time-limited and decided case by case, with no standing categories. In addition to the possible exemption categories outlined in the paper, hardship and vulnerability grounds, age and health vulnerabilities, could also be grounds for consideration for a case by case exemption. For example, a low income household exempted from the regulation still has an old gas appliance, still pays to run it, and picks up a growing share of network costs as other customers leave, so the exemption may leave them worse off the longer it lasts.

19 - Are there any other considerations you believe are important to informing potential gas appliance regulations?

Waste

Waste is an important consideration - old gas appliances and ducting typically go to landfill, despite containing recoverable metals.[25] Regulation that drives replacement at scale will generate a large volume of this material, so it should be paired with recovery and recycling requirements, consistent with the ACT Circular Economy Strategy.[26]

Gas Industry Worker Transition

To ensure a just transition for gas industry workers, including plumbers and gas fitters, the ACT Government should establish a workforce plan and fund trade sector training and an industry information campaign to support potential regulations.

Advertising of gas appliances

Advertising of gas appliances by gas providers is a further consideration. It is highly misleading to advertise gas appliances to consumers without disclosing the ACT's planned gas network shutdown. As a partial owner of the ActewAGL, the ACT Government should require ActewAGL to immediately stop advertising and promoting gas appliances.

Reducing the cost of gas network disconnection and abolishment

The cost of voluntary disconnection and abolishment of gas connections should also be addressed alongside regulations.The standard cost of abolishment is $760, in addition to energy retailer administration fees.[27] While this fee is regulated and assessed by the Australian Energy Regulator, the ACT Government should consider covering these costs to incentivise as many households as possible to get off gas — particularly low-income and vulnerable households.

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[25] Conservation Council ACT Region, *Submission to ACT Government Integrated Energy Policy: Regulation to Prevent New Gas Connections in the ACT*, 6.
[26] ACT Government, *Future Appliance Regulations to Support the Gas Transition*, 41.
[27] ACT Government 2026, *Switching off your gas connection*, https://energy.act.gov.au/switching-off-your-gas-connection/

Implementing the gas network shutdown

Novel ways of coordinating the implementation of the gas network shutdown have not been discussed within the paper. For example, 'Community Electrification Cells', could provide evidence on costs, household savings, workforce requirements, consumer protection, and the practical coordination eventually needed to retire the gas network geographically across the ACT.[28] In these cells, a voluntary group of households in a suburb, connected to the same part of the gas network, would coordinate household assessments, electrical upgrades, bulk purchasing, finance and the availability of tradespeople. This model could be piloted to test regulations under real conditions before a broader rollout demonstrating whether households have access to suitable electric alternatives, affordable assistance and qualified installers, while identifying any challenges with electricity network capacity.

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